

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

LISA BARBOUNIS, : CIVIL ACTION  
Plaintiff, :  
: :  
vs. :  
: :  
MIDDLE EAST FORUM, et al., :  
Defendants. : NO. 2:19-cv-05030-GAM

Tuesday, November 17, 2020

Videotaped deposition of DANIEL PIPES,  
taken pursuant to Notice and remotely via Zoom at  
1650 Market Street, Philadelphia, Pennsylvania,  
commencing at 10:08 a.m., and reported  
stenographically by Grace M. Baldino, Professional  
Shorthand Reporter and Notary Public in and for the  
Commonwealth of Pennsylvania.

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21 LEIGH ANN BENSON, Esquire (Cozen O'Connor)  
22 GREGG ROMAN, Defendant  
23 MARC FINK, MEF Representative  
24 LISA BARBOUNIS, Plaintiff  
25 SIDNEY L. GOLD, Esquire

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2	(It is hereby stipulated and agreed by and	2	EXAMINATION
3	among counsel for the respective parties that	3	---
4	sealing, certification and filing are waived;	4	BY MR. CARSON:
5	and that all objections, except as to the form	5	Q. Mr. Pipes, we're here today to take your
6	of the question, be reserved until the time of	6	deposition in the matter of Lisa Barbounis vs. The
7	trial.)	7	Middle East Forum, Gregg Roman, Daniel Pipes, which
8	---	8	is you, and we're here today to take your
9	THE VIDEOGRAPHER: We are now on the	9	deposition. Have you ever done a deposition before?
10	record. Today's date is Tuesday, November	10	A. No.
11	17th, 2020, and the time is 10:08 a.m. EST.	11	Q. I'm sorry?
12	This is the recorded video deposition of Daniel	12	A. No.
13	Pipes in the matter of Lisa Barbounis versus	13	Q. Okay. So I think you probably watched
14	Middle East Forum, et al. in the United States	14	enough of these now that you can probably give me
15	District Court, Eastern District of	15	the instructions back to me, but I'm just gonna run
16	Pennsylvania, Code No. 2:19-CV-05030-GAM. My	16	through them really quickly anyway, and if you have
17	name is Luke Zabroske from Everest Court	17	any questions about the deposition, just speak up
18	Reporting. I am the video specialist. The	18	and ask, and we'll make sure we answer them for you.
19	court reporter today is Grace Baldino, also	19	So the first thing is that it's a question and
20	from Everest Court Reporting. All counsel	20	answer session. We're here today. I'm gonna ask
21	appearing today will be noted on the	21	questions. You're gonna provided responses. You
22	stenographic record. Will the court reporter	22	can provide any response that you want -- yes, no,
23	please swear in the witness.	23	"I don't know," "I don't remember," or any other
24	THE COURT REPORTER: Due to the need for	24	responsive -- or any other responsive answer that
	this deposition to take place remotely because		you care to provide today, but it's important that
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1	---	1	---
2	of the Government's order for social	2	all your answers be verbal. So nods and shrugs and
3	distancing, the parties will stipulate that the	3	"uh-huhs" and "uh-uhs," you know, we all kind of do
4	court reporter may swear in the witness	4	that sometimes. If you do, I may ask you to speak
5	remotely via videoconference and that the	5	up and just say yes or no. It's just that we're
6	witness has verified that he is, in fact,	6	trying to create a clear record, okay?
7	Daniel Pipes. Will the attorneys please	7	A. Yes.
8	indicate agreement by stating your name and	8	Q. Yes?
9	your agreement on the record, beginning with	9	A. Yes.
10	counsel for plaintiff.	10	Q. Okay. So the second thing is if I ask you
11	MR. CARSON: I represent Lisa Barbounis.	11	a question and you answer the question, we're gonna
12	My name is Seth Carson.	12	assume that you understood the question. If there's
13	MR. CAVALIER: Jon Cavalier at Cozen	13	any questions today that you don't understand, all
14	O'Connor representing the Middle East Forum.	14	you have to do is ask me to rephrase or repeat it,
15	We agree to that condition, and also I'll note	15	and we'll be happy to do that today, okay?
16	for the record the witness will read and sign.	16	A. Yes.
17	THE COURT REPORTER: Okay.	17	Q. It's important that we don't speak over
18	MR. RIESER: William Rieser on behalf of	18	each other today. So, especially with Zoom, I think
19	Gregg Roman, and I agree to those conditions as	19	that software only can hear one person talking at a
20	well. Thank you.	20	time or record one person talking at a time, so
21	---	21	please do me a favor. Let me finish my answer. I
22	DANIEL PIPES, after having been first	22	promise I'll let you finish your -- let me finish my
23	remotely duly sworn, was examined and testified	23	question. I promise I'll let your finish your
24	as follows:	24	response, and we'll try not to drive the court
	---		reporter crazy today with interruptions, okay?

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	<p style="text-align: center;">---</p> <p>1 A. Yes.</p> <p>2 Q. You've been sworn in, so you're under 3 oath. It's important that all your responses be to 4 the best -- honest and truthful to the best of your 5 ability. Do you understand that?</p> <p>6 A. I do.</p> <p>7 Q. Can you please state your full name for 8 the record?</p> <p>9 A. Daniel Pipes.</p> <p>10 Q. And, Mr. Pipes, where do you work?</p> <p>11 A. Middle East Forum.</p> <p>12 Q. And how long have you worked with the 13 Middle East Forum?</p> <p>14 A. Twenty-six years.</p> <p>15 Q. How did the Middle East Forum come into 16 existence?</p> <p>17 A. I created it with a couple of colleagues.</p> <p>18 Q. Who did you create it with?</p> <p>19 A. Albert Wood, Amy Shargel.</p> <p>20 Q. Can you say those names again, please?</p> <p>21 A. Albert Wood, Amy Shargel.</p> <p>22 Q. Amy Shardelle? Is that S-H-A-R-D-E-L-L-E?</p> <p>23 A. G-E-L.</p> <p>24 Q. Do Albert Wood and Amy Shargel still have</p>		<p style="text-align: center;">---</p> <p>1 Q. The organization is a 501(c)(3); is that 2 correct?</p> <p>3 A. Yes.</p> <p>4 Q. What is a 501(c)(3)?</p> <p>5 A. Nonprofit.</p> <p>6 Q. Are there different types of nonprofit 7 organizations?</p> <p>8 A. Yes.</p> <p>9 Q. Is there a 501(c)(4)?</p> <p>10 A. Yes.</p> <p>11 Q. Is there a 501(c)(2)?</p> <p>12 A. I don't know.</p> <p>13 Q. So what's the difference between a 14 501(c)(3) and a 501(c)(4)?</p> <p>15 A. I don't know. It's a legal matter. You 16 can look it up.</p> <p>17 Q. Is the difference have anything to do with 18 solicitation or activities with politics?</p> <p>19 A. I'm a specialist on the Middle East, not 20 American tax law.</p> <p>21 Q. Do you know the answer?</p> <p>22 A. No. I --</p> <p>23 Q. You don't know what -- so tell me what a 24 501(c)(3) is then.</p>
	<p style="text-align: center;">Page 10</p> <p style="text-align: center;">---</p> <p>1 any -- do they still work at the Forum in any 2 capacity?</p> <p>3 A. No.</p> <p>4 Q. And when you created the organization 26 5 years ago, do you remember the date when it was 6 created, by any chance?</p> <p>7 A. January 24th.</p> <p>8 Q. What year?</p> <p>9 A. 1994.</p> <p>10 Q. 1994. And when you created the 11 organization on January 24th, 1994, what was the 12 type of entity that you created? What's it called?</p> <p>13 A. Middle East Forum.</p> <p>14 Q. So is it called The Middle East Forum? Is 15 that the legal name?</p> <p>16 A. No.</p> <p>17 Q. It's Middle East Forum?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. And is there a business 20 classification for the type of organization that is?</p> <p>21 MR. CAVALIER: Object to form. You can 22 answer, Daniel.</p> <p>23 THE WITNESS: 501(c)(3).</p> <p>24 BY MR. CARSON:</p>		<p style="text-align: center;">Page 12</p> <p style="text-align: center;">---</p> <p>1 A. A nonprofit.</p> <p>2 Q. Okay. So what type of nonprofit is it?</p> <p>3 Are you guys allowed to do political work?</p> <p>4 A. No.</p> <p>5 Q. Why not?</p> <p>6 A. Because our status as a 501(c)(3) does not 7 allow us to do political work.</p> <p>8 Q. Do you ever consider opening a 501(c)(4)?</p> <p>9 A. Yes.</p> <p>10 Q. When?</p> <p>11 A. In late 2019, early two thousand -- 12 sorry -- late 2018, early 2019.</p> <p>13 Q. Why did you consider opening a 501(c)(4)?</p> <p>14 A. Because it's useful in itself and because 15 it could be a way in which Gregg Roman could be 16 helpful to our efforts with that, the complications 17 that had arisen.</p> <p>18 Q. In other words, the 501(c)(4) was some -- 19 strike that. When you were considering -- did you, 20 in fact, open a 501(c)(4)?</p> <p>21 A. No.</p> <p>22 Q. Why?</p> <p>23 A. Because he rejoined the 501(c)(3).</p> <p>24 Q. What do you mean by "he rejoined the</p>

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	<p style="text-align: center;">---</p> <p>1 501(c)(3)"?</p> <p>2 A. Not exactly rejoined. He became more 3 active and more of a participant in the 501(c)(3).</p> <p>4 Q. What do you mean, he became more active in 5 the 501(c)(3)?</p> <p>6 A. I was approached by Lisa Barbounis, who 7 asked him to return -- asked me to have him return. 8 At that point, we proceeded in having him return 9 more fully and scuttled the 501(c)(4) idea.</p> <p>10 Q. When did you scuttle the 501(c)(4) idea?</p> <p>11 A. March 2019.</p> <p>12 Q. In March 2018, did you say?</p> <p>13 A. '19.</p> <p>14 Q. '19. So what happened -- so you guys 15 don't have any interest in doing work with politics 16 anymore?</p> <p>17 MR. CAVALIER: Object to form. You can 18 answer.</p> <p>19 THE WITNESS: I don't know what you're 20 asking.</p> <p>21 BY MR. CARSON:</p> <p>22 Q. Sure. You testified earlier that the 23 reason why you were considering opening a 501(c)(4) 24 was to allow Gregg to do work in politics, correct?</p>	<p style="text-align: center;">---</p> <p>1 (Whereupon the court reporter read back 2 the pertinent testimony.)</p> <p>3</p> <p>4</p> <p>5 BY MR. CARSON:</p> <p>6 Q. Yeah. What complications are you talking 7 about?</p> <p>8 A. The -- the wish -- the fact that several 9 employees have problems with his management style.</p> <p>10 Q. So what does a 501(c)(4) have to do with 11 his management style?</p> <p>12 A. It would be a separate organization.</p> <p>13 Q. Would it be underneath the Middle East 14 Forum?</p> <p>15 A. No.</p> <p>16 Q. Would it have anything to do with the 17 Middle East Forum?</p> <p>18 A. No.</p> <p>19 Q. It would be a completely separate 20 organization that has nothing to do with the Middle 21 East Forum? That's your testimony?</p> <p>22 A. That's what the law is, I believe, that a 23 501(c)(4) is separate from a 501(c)(3), though many 24 organizations have both. As far as I know, they're</p>	Page 15
	<p style="text-align: center;">Page 14</p> <p>1 A. No, I didn't say that.</p> <p>2 Q. Why did you consider opening a 501(c)(4)?</p> <p>3 MR. CAVALIER: Object to form. You can 4 answer.</p> <p>5 THE WITNESS: Because it seemed like a 6 good idea and looking for a way for Gregg to be 7 part of the organization without the 8 complications that had arisen.</p> <p>9 BY MR. CARSON:</p> <p>10 Q. Without what complications? You gotta 11 speak up, Mr. Pipes.</p> <p>12 MR. CAVALIER: Seth, I can hear him fine.</p> <p>13 MR. CARSON: I can't, and I think --</p> <p>14 MR. CAVALIER: Can the court reporter hear 15 him okay?</p> <p>16 THE COURT REPORTER: He's a little quiet 17 to me, too.</p> <p>18 MR. CAVALIER: Okay. Daniel --</p> <p>19 MR. CARSON: You can't hear him fine, 20 either, so just -- I mean, he has to speak up, 21 period.</p> <p>22 THE WITNESS: What's your question?</p> <p>23 MR. CARSON: Can you read back my 24 question, please? I don't remember.</p>	<p style="text-align: center;">---</p> <p>1 separate. We never did it, so I don't know the law. 2 You can check the lawbooks.</p> <p>3 Q. I'm asking about your intention, though. 4 Who was gonna be the -- who were gonna be the 5 members of the 501(c)(4) when you were considering 6 starting one?</p> <p>7 A. What do you mean by "members"?</p> <p>8 Q. Who were gonna be the officers?</p> <p>9 A. I don't know. We never got that far.</p> <p>10 Q. When you start a organization like a 11 501(c)(3), do you have to -- does an individual have 12 to be listed to start the organization?</p> <p>13 A. Check the lawbooks. I don't know.</p> <p>14 Q. Well, were you listed when you started the 15 501(c)(3)?</p> <p>16 MR. CAVALIER: Object to form.</p> <p>17 THE WITNESS: We did not start. We were 18 planning --</p> <p>19 BY MR. CARSON:</p> <p>20 Q. Sorry?</p> <p>21 A. We were planning it. We did not start it.</p> <p>22 Q. All right. So when you were planning on 23 starting the 501(c)(4), was it your intention that 24 the 501(c)(4) be connected to the 501(c)(3) in some</p>	Page 16

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	<p style="text-align: center;">---</p> <p>1 capacity?</p> <p>2 MR. CAVALIER: Object to form.</p> <p>3 THE WITNESS: What does "connected" mean?</p> <p>4 MR. CARSON: Involved with.</p> <p>5 MR. CAVALIER: Same objection.</p> <p>6 THE WITNESS: I don't know what "involved with" means.</p> <p>7 BY MR. CARSON:</p> <p>8 Q. Well, do you know -- do you want me to look up the definition of "involved"? What part don't you understand?</p> <p>9 A. I know English, but I don't know what you mean in this case.</p> <p>10 Q. Was there gonna be a relationship between the 501(c)(3), the Middle East Forum that you are working with now, and the 501(c)(4)?</p> <p>11 MR. CAVALIER: Object to form. Asked and answered.</p> <p>12 THE WITNESS: We were gonna --</p> <p>13 MR. CARSON: What're you talking about, asked and answered? He said he doesn't know what I mean.</p> <p>14 THE WITNESS: We were gonna follow the legal requirements, whatever those are, and I'm</p>	<p style="text-align: center;">---</p> <p>1 not a specialist on these laws. Check your lawbooks to find out what the --</p> <p>2 BY MR. CARSON:</p> <p>3 Q. My question is about your intention --</p> <p>4 A. You're not to interrupt me, Mr. Carson.</p> <p>5 You're not to interrupt me. Isn't that the rule of this?</p> <p>6 Q. My question is about your intention, Mr. Pipes.</p> <p>7 A. I thought I am answering, and when I answer, you be quiet. Is that not the rule? Tell me.</p> <p>8 Q. I'm asking about your intentions, Mr. Pipes.</p> <p>9 A. Answer my question. Are you gonna interrupt me, or you gonna let me speak?</p> <p>10 Q. You can proceed. I don't answer your questions today.</p> <p>11 A. Well, then, I'm not gonna answers yours.</p> <p>12 Q. That's actually not how it works.</p> <p>13 A. Well, it's gonna work that way.</p> <p>14 Q. If you need a break --</p> <p>15 A. You're not gonna interrupt me.</p> <p>16 Q. If you need to stop and talk to your</p>	
	Page 18		Page 20
	<p style="text-align: center;">---</p> <p>1 not capable of telling you what those are.</p> <p>2 BY MR. CARSON:</p> <p>3 Q. You answer's nonresponsive. My question is, did you have an intention for the 501(c)(4) to work with the 501(c)(3)?</p> <p>4 MR. CAVALIER: Object to form. Asked and answered. Argumentative. Dan, you can answer, and, again --</p> <p>5 MR. CARSON: Jon, if you keep doing it, we're gonna get on the phone with Judge Wolson quick. Please, you're not gonna interrupt my deposition all day with nonsense objections.</p> <p>6 MR. CAVALIER: The irony of that statement coming from --</p> <p>7 MR. CARSON: You're not -- you're just not gonna do it, all right? You're not gonna do it.</p> <p>8 MR. CAVALIER: Call the judge.</p> <p>9 MR. CARSON: So just stop.</p> <p>10 MR. CAVALIER: Daniel, if you can answer the question, feel free to do so.</p> <p>11 THE WITNESS: We were planning it. There are complicated laws about what you can and can't do. We didn't go through with it. I'm</p>	<p style="text-align: center;">---</p> <p>1 lawyer --</p> <p>2 A. I don't need to stop. You're not gonna interrupt me.</p> <p>3 MR. CAVALIER: Let him finish his answer, Seth. Daniel, to the extent you can answer the question, go ahead and try your best to answer it again.</p> <p>4 THE WITNESS: What is the question?</p> <p>5 BY MR. CARSON:</p> <p>6 Q. The question is, was the 501(c)(4) gonna be related in any way with this 501(c)(3)?</p> <p>7 A. What does "related" mean?</p> <p>8 Q. Involved with, related, connected to. Was there gonna be any relationship between the two organizations?</p> <p>9 MR. CAVALIER: Same objection. Daniel --</p> <p>10 BY MR. CARSON:</p> <p>11 Q. Were they gonna work together? Were they gonna have the same staff? Was there any relationship between the two? It's a simple question. Yes or no?</p> <p>12 MR. CAVALIER: Same objection. Daniel, to the extent you can answer, go ahead.</p> <p>13 THE WITNESS: One, it never happened, and,</p>	

	Page 21		Page 23
1	---	1	threatened to stop the deposition three times
2	two, I don't know the complex laws between --	2	in the first 20 minutes.
3	of relations between threes and fours off the	3	MR. CAVALIER: Don't answer the question,
4	top of my head. So I cannot answer that.	4	Daniel. You're not under any kind of order
5	BY MR. CARSON:	5	here today.
6	Q. Well, do you remember when you were gonna	6	MR. CARSON: Yes, he is.
7	open a 501(c)(4)? Do you remember that? Do you	7	MR. CAVALIER: Ask your question, Seth.
8	remember what your intentions were at that time?	8	You're under an order. I'm under an order.
9	A. Open a 501(c)(4).	9	Daniel Pipes is not under any orders --
10	Q. Did you have any intentions with regard to	10	MR. CARSON: You're an agent of Mr. Pipes.
11	the type of organization the 501(c)(4) was gonna	11	That's a funny characterization of the court's
12	have with the 501(c)(3)? We're just wasting time --	12	order, but I guess we can clear it up pretty
13	---	13	easily, but it would --
14	(Indistinguishable cross-talk.)	14	MR. CAVALIER: Well, I guess we should
15	---	15	probably not talk about compliance with court
16	THE WITNESS: Are you gonna interrupt me	16	orders on the record. So if you have a
17	again?	17	question --
18	MR. CARSON: These aren't trick questions,	18	MR. CARSON: Got no problem talking about
19	Mr. Pipes. We're just wasting time by --	19	it.
20	MR. CAVALIER: Just let him try to answer	20	MR. CAVALIER: Ask the question, and we'll
21	the question.	21	go forward.
22	THE WITNESS: I will not be interrupted by	22	MR. CARSON: Read my last question.
23	you, Mr. Carson.	23	---
24	MR. CARSON: Okay.	24	(Whereupon the court reporter read back
	Page 22		Page 24
1	---	1	the pertinent testimony.)
2	You don't interrupt me. Can I be clear on	2	---
3	that? I'm not gonna proceed with this if you	3	THE WITNESS: Yes.
4	keep interrupting me. Do you understand?	4	BY MR. CARSON:
5	BY MR. CARSON:	5	Q. Who was gonna be involved in the 501(c)(4)
6	Q. You do know you're under court order	6	besides Gregg Roman?
7	today, right, Mr. Pipes, to be here?	7	A. [Inaudible].
8	A. You do understand that you're not supposed	8	Q. Sorry?
9	to interrupt me?	9	A. Only him.
10	Q. Are you aware that there's a court order	10	Q. How were you gonna pay Gregg Roman when he
11	for you to be here today, Mr. Pipes?	11	started working with the 501(c)(4)?
12	A. I am.	12	MR. CAVALIER: Object to form. You can
13	MR. CAVALIER: I object to the --	13	answer.
14	THE WITNESS: Are you aware there's a	14	BY MR. CARSON:
15	court order that requires you be here, too,	15	Q. How was he gonna be compensated?
16	Mr. Carson?	16	A. We did not get that far.
17	BY MR. CARSON:	17	Q. You didn't talk to anyone about how
18	Q. Mr. Pipes, what do you know about the	18	Mr. Roman was gonna be compensated when he began
19	court order today that has you appearing today for a	19	working with the 501(c)(4)?
20	deposition?	20	A. No.
21	MR. CAVALIER: Hold on a second. Hold on	21	Q. The answer is no?
22	a second, Daniel. Don't answer that. That's a	22	A. Yes.
23	gross mischaracterization of the order. It's	23	Q. Okay. How far did you get?
24	completely irrelevant.	24	A. We talked to potential donors.

	Page 25		Page 27
1	<p>Q. What else did you do?</p> <p>A. We looked into the legalities.</p> <p>Q. How did you look into legalities?</p> <p>A. I don't remember.</p> <p>Q. What do you mean, you don't know?</p> <p>A. I --</p> <p>Q. How do you know you did it then?</p> <p>A. "I don't remember" is a simple English phrase that I think you understand.</p> <p>Q. Well, are you sure you looked into the legalities if you don't remember how you did it?</p> <p>A. I remember discussion about legalities.</p> <p>Q. Who was the discussion with? Who was --</p> <p>---</p> <p>(Indistinguishable cross-talk.)</p> <p>---</p>	<p>A. What do you mean?</p> <p>Q. Is he paid a salary? Is he paid by the hour? Is he paid by the year?</p> <p>A. A salary.</p> <p>Q. He's paid a salary? What's his salary?</p> <p>A. I don't know.</p> <p>Q. Who knows what his salary is?</p> <p>A. The accountant.</p> <p>Q. Who's the accountant?</p> <p>A. [Inaudible].</p>	<p>THE COURT REPORTER: What was the --</p> <p>THE WITNESS: The accountant. I don't remember the name of the accountant. Her name is Amy, but I forgot her last name and the company.</p> <p>BY MR. CARSON:</p> <p>Q. Amy? Is Amy an employee of the Middle East Forum?</p> <p>A. No. This is a different Amy from the first Amy. No, she's not employee. She works for accounting company that does our accounting.</p> <p>Q. Okay. Does the Middle East Forum have a bookkeeper?</p> <p>A. No. I mean, yes, the company. Not an</p>
1	<p>THE WITNESS: Gregg.</p> <p>BY MR. CARSON:</p> <p>Q. Who else was present when you held this discussion?</p> <p>A. I don't remember.</p> <p>Q. Did you hold discussions about the 501(c)(4) and 501(c)(3) with anyone else besides Gregg?</p>	<p>Page 26</p> <p>---</p> <p>A. Marc Fink.</p> <p>Q. How about anybody else besides Gregg and Marc Fink?</p> <p>A. I don't think so.</p> <p>Q. Did you hold discussions with Lisa Barbounis about it?</p> <p>A. Who is "you"?</p> <p>Q. You, Mr. Pipes, are you.</p> <p>A. I don't believe so, no.</p> <p>Q. Did you hold discussions with Patricia McNulty about it?</p> <p>A. Believe so.</p> <p>Q. Did you hold discussions with Marnie Meyer about it?</p> <p>A. Don't believe so.</p> <p>Q. How is Gregg Roman paid?</p> <p>MR. CAVALIER: Object to form. You can answer.</p> <p>BY MR. CARSON:</p> <p>Q. I can set it up. Is Gregg Roman employee of the Middle East Forum?</p> <p>A. Yes.</p> <p>Q. How is he paid? How does the Middle East Forum compensate Gregg Roman?</p>	<p>individual.</p> <p>Q. What's the name of the company?</p> <p>A. I don't remember.</p> <p>Q. What do you mean, you don't -- can you look it up? We can stop, and you can look it up.</p> <p>A. I can look it up, yeah.</p> <p>MR. CAVALIER: We're not doing that, Seth.</p> <p>MR. CARSON: Yeah. I need to know the name of the company that does the bookkeeping.</p> <p>MR. CAVALIER: Then send an interrogatory or ask another witness.</p> <p>MR. CARSON: I'm asking --</p> <p>BY MR. CARSON:</p> <p>Q. What's your -- what's your position with the Middle East Forum?</p> <p>A. President.</p> <p>Q. So who decided to retain this company that does the accounting?</p> <p>A. Let me make a point now that will be -- that I'll be coming back to over and over again. Middle East Forum has about 25 employees. Each one of them does a specialized task. I do not do what all the other 25 do. I can't do all the things they do. I provide leadership. I provide intellectual</p>

	Page 29		Page 31
1	---	1	---
2	underpinnings. I'm not engaged in the details of	2	Mr. Pipes?
3	employment, finances, legal, office management,	3	A. I'm not answering that. I'm gonna finish
4	technology, and so forth. So you will find on many	4	my statement.
5	occasions, when you ask me specifics, I will not	5	MR. CAVALIER: Finish what -- finish your
6	know. This does not mean I am not the CEO. This	6	answer, Daniel, and then we can move on.
7	does not mean I don't make the ultimate decisions,	7	THE WITNESS: I am the head of the Middle
8	but it does mean that others make many decisions	8	East Forum. I do not do all the jobs. There
9	along the way and just check with -- sometimes on	9	are 25 --
10	their own, and sometimes they check with me.	10	BY MR. CARSON:
11	Q. Are you the CEO?	11	Q. Mr. Pipes, you said all this already.
12	A. Are you interrupting me again?	12	A. All right. But you --
13	Q. Are you the CEO?	13	Q. Is there something that you wanna add to
14	---	14	your answer?
15	(Indistinguishable cross-talk.)	15	A. Interrupting me again?
16	---	16	MR. CAVALIER: Seth, if you keep
17	MR. CAVALIER: Hold on. Daniel, finish	17	interrupting him, we are gonna stop.
18	your answer.	18	MR. CARSON: I think we should. I think
19	BY MR. CARSON:	19	you should have a conversation with your client
20	Q. You don't have to finish your answer.	20	about how depositions --
21	Your answer is totally nonresponsive anyway.	21	MR. CAVALIER: No. I mean we're gonna
22	A. I can't believe it.	22	stop for the whole day.
23	---	23	MR. CARSON: That's not gonna happen, Jon,
24	(Indistinguishable cross-talk.)	24	so don't even try threatening, okay, because
	---		it's --
	Page 30		Page 32
1	---	1	---
2	THE COURT REPORTER: Guys, we gotta do one	2	(Indistinguishable cross-talk.)
3	at a time, all right?	3	---
4	BY MR. CARSON:	4	MR. CAVALIER: -- and we'll move on.
5	Q. Are you the CEO of the Middle East Forum?	5	BY MR. CARSON:
6	A. You gonna interrupt me?	6	Q. Mr. Pipes, do you have something new to
7	Q. Mr. Pipes, are you the CEO of the Middle	7	say to your answer, because you don't have to go and
8	East Forum?	8	repeat the whole thing again. We have the record.
9	A. Are you gonna interrupt me, Mr. Carson?	9	We can read it back if we need to.
10	---	10	A. I am not going to be interrupted. Is that
11	(Indistinguishable cross-talk.)	11	clear? And I wanna say what I wanna say.
12	---	12	Q. Okay. Are you done?
13	MR. CARSON: I'm happy to give you guys	13	A. No, I'm not done.
14	time if you wanna sit down and have a	14	Q. Okay. Do you wanna finish? Go ahead.
15	conversation with your client about	15	A. I wanna finish.
16	depositions.	16	Q. Please only provide new information that
17	THE WITNESS: I don't need any time. I	17	you haven't --
18	want you to --	18	A. I will tell you what I want to tell you,
19	MR. CAVALIER: I think he's entitled to	19	and you will listen. That's the deal.
20	ask you not to interrupt him and let him finish	20	Q. Are you the CEO of the Middle East Forum,
21	his answer. I mean, that's what we've been	21	Mr. Pipes?
22	doing. I let Lisa go on for pages of the	22	A. As I was saying, I am the head of the
23	transcript.	23	organization, which means I provide leadership and,
24	BY MR. CARSON:	24	in many cases, take the ultimate decision, but I
Q. Are you the CEO of the Middle East Forum,			

	Page 33		Page 35
1	<p>---</p> <p>1 don't take all the decisions, and I don't know all 2 that's going on. This does not mean I am unaware. 3 It means that I am filling my job as CEO, as the 4 president. So when you ask me about the accounting 5 and how we decided it, Gregg, who is the COO, he 6 chose the company, he told me about the various 7 companies, and he got my okay to go with a company 8 whose name I don't remember.</p> <p>9 Q. So Gregg Roman knows who this accounting 10 company is? Is that your testimony?</p> <p>11 A. You have to ask him.</p> <p>12 Q. Well, I'm asking you. Does Gregg Roman 13 know who they are?</p> <p>14 MR. CAVALIER: Object to form.</p> <p>15 THE WITNESS: I don't know what Gregg 16 Roman knows and doesn't know.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. Okay. Do you know who they are?</p> <p>19 A. I told you I do not know --</p> <p>20 MR. CAVALIER: Object to form.</p> <p>21 BY MR. CARSON:</p> <p>22 Q. Have you ever worked with them before?</p> <p>23 A. What does "work with them before" mean?</p> <p>24 Q. Have you ever worked with them before?</p>	<p>1 A. Amy's the person that the Forum works with 2 most closely.</p> <p>3 Q. The person at the Forum who works with 4 who?</p> <p>5 A. Most closely.</p> <p>6 Q. With what?</p> <p>7 A. Most closely.</p> <p>8 Q. Amy's the person at the Forum that you 9 work with most closely? That's your testimony?</p> <p>10 MR. CAVALIER: Objection. That's not what 11 he said, Seth.</p> <p>12 MR. CARSON: I -- well, it'd be nice if I 13 could hear him, Jon.</p> <p>14 MR. CAVALIER: I can hear him fine.</p> <p>15 MR. CARSON: Well, does it matter if you 16 can hear him fine if I can't?</p> <p>17 MR. CAVALIER: Turn your computer up. I 18 don't know what to tell you.</p> <p>19 MR. CARSON: My computer's up all the way. 20 You have to speak up, Mr. Pipes.</p> <p>21 THE WITNESS: Get a better computer, Mr. 22 Carson.</p> <p>23 MR. CARSON: If we're gonna have problem 24 with the technology today, then we're gonna</p>	Page 36
1	<p>---</p> <p>1 A. I don't know what you mean. Be specific.</p> <p>2 Q. I'm not being specific. I'm being</p> <p>3 general. In your entire life, have you ever worked 4 with the accounting company who does the books for 5 the Middle East Forum?</p> <p>6 A. Since they started working with us, yes.</p> <p>7 Q. So when did they start working with you?</p> <p>8 A. Early 2020.</p> <p>9 Q. What's the date?</p> <p>10 A. Early 2020.</p> <p>11 Q. Who chose them?</p> <p>12 A. Gregg looked at several companies and, in 13 the end, decided on this one, checked with me, so I 14 said okay.</p> <p>15 Q. Do you have one person there, or do you 16 have more than one person that you work with?</p> <p>17 A. I don't know.</p> <p>18 Q. Who's the contact that you've talked with 19 there?</p> <p>20 A. I don't know.</p> <p>21 Q. Is her name Amy?</p> <p>22 A. I don't talk to anyone.</p> <p>23 Q. Well, who's Amy? When you testified about 24 Amy, who's that?</p>	<p>1 have to do something about it, but you have to 2 speak up. You're whispering.</p> <p>3 THE WITNESS: I'm speaking at normal 4 voice.</p> <p>5 MR. CARSON: No, you're not.</p> <p>6 MR. CAVALIER: I'm not gonna let you do 7 that, Seth.</p> <p>8 MR. CARSON: Jon, stop telling me what 9 you're gonna do and what you're not gonna do, 10 okay? Seriously.</p> <p>11 MR. CAVALIER: All right. We're gonna 12 take a break.</p> <p>13 MR. CARSON: Maybe while on the break you 14 can have your client speak up when he comes 15 back because this is getting ridiculous. It's 16 just ridiculous. This is not how depositions 17 are supposed --</p> <p>18 MR. CAVALIER: There are lots of things 19 that are ridiculous about this case, Seth. 20 We're going off the record.</p> <p>21 MR. CARSON: That's not an excuse, Jon. 22 Get your client in order, man.</p> <p>23 THE VIDEOGRAPHER: We are now off the 24 record.</p>	Page 36

	Page 37		Page 39
1	---	1	---
2	---	2	A. What do you mean?
3	(Whereupon there was a recess in the	3	Q. Where do you keep the donations after
4	proceeding from 10:35 a.m. to 10:45 a.m.)	4	they're made?
5	---	5	A. We have a bank account.
6	THE VIDEOGRAPHER: The time is 10:45 a.m.	6	Q. Okay. Do you guys invest the donations,
7	Eastern Time. We are now on the record. Thank	7	or you just keep them all in a bank account? How
8	you for your patience, guys. Apologize.	8	does that work?
9	BY MR. CARSON:	9	A. A mix.
10	Q. Who approved how much money Gregg Roman	10	Q. Did you say a mix?
11	was paid for the Middle East Forum?	11	A. A mix.
12	A. I decided with the chairman of the	12	Q. So how much money does the Middle East
13	executive committee.	13	Forum have invested?
14	Q. When did you make that decision?	14	A. I don't know.
15	A. I do it annually.	15	Q. Well, when's the last time you checked?
16	Q. So you -- when did it happen last?	16	A. Month ago.
17	A. In late 2019 or early 2020.	17	Q. I'm sorry?
18	Q. And how much money did you approve this	18	A. Month ago.
19	year?	19	Q. You checked a month ago?
20	A. I don't remember.	20	A. Yeah. I looked at the account.
21	Q. For Gregg's salary?	21	Q. Okay. So a month ago, what did it say?
22	A. I don't remember.	22	A. I don't know. I do not memorize numbers.
23	Q. Okay. Why don't you remember?	23	Q. Well, ballpark it approximately.
24	MR. CAVALIER: Object to form.	24	A. I -- I can't.
	THE WITNESS: We do a lot of the things,	24	Q. Why not?
	Page 38		Page 40
1	---	1	---
2	and I do not recall them months and years	2	A. I don't remember. It's easy enough to
3	later, the numbers.	3	look up.
4	BY MR. CARSON:	4	Q. Okay. So where would you go to look that
5	Q. Do you get paid through the Middle East	5	up?
6	Forum?	6	A. I would go to the company that has our
7	A. I do get paid.	7	money invested.
8	Q. How much do you get paid?	8	Q. What company is that?
9	A. I can't give you an exact number.	9	A. Raymond James.
10	Q. Well, give me a ballpark.	10	Q. Raymond James?
11	A. 240,000.	11	A. Yep, and PNC, and maybe others smaller
12	Q. \$240,000 a year?	12	amounts.
13	A. Yeah.	13	Q. How long have you been working with
14	Q. And how much money does the Middle East	14	Raymond James?
15	Forum take in donations every year?	15	A. Four years.
16	MR. CAVALIER: Object to form.	16	Q. And the portfolio that you keep with
17	THE WITNESS: I can't remember.	17	Raymond James, does that include stocks and bonds?
18	BY MR. CARSON:	18	A. I believe so.
19	Q. Well, give me a ballpark.	19	Q. How about you? What are you worth?
20	A. There's a 990 form that you can go and	20	MR. CAVALIER: Object to form.
21	look it up.	21	THE WITNESS: None of your business.
22	Q. What's a 990 form?	22	MR. CARSON: No, it actually is our
23	A. It's an IRS form for nonprofits.	23	business. It goes to punitive damages.
24	Q. Does the Middle East Forum have an account	24	MR. CAVALIER: Personally? Daniel, you
	where they keep the donations?		don't have to answer that question.

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1	---	1	with everything at once, and we'll get all
2	MR. CARSON: No, he does have to answer	2	those questions answered before the end of the
3	it.	3	deposition, so I'll just keep a list here. I
4	MR. CAVALIER: He's not going to.	4	mean, I'd be happy to send you the case law.
5	MR. CARSON: Well, then we're gonna call	5	MR. CAVALIER: Okay.
6	Judge Wolson, okay?	6	MR. CARSON: It's well settled.
7	MR. CAVALIER: Hold up.	7	MR. CAVALIER: I will look forward to it.
8	MR. CARSON: That's no problem. We will.	8	MR. CARSON: I mean, we -- I'll send it to
9	It goes directly to punitive damages.	9	you on the next break. Maybe then we can
10	MR. CAVALIER: Daniel Pipes' personal net	10	resolve it without getting the judge involved,
11	worth goes to punitive damages?	11	but if the judge gets involved, in the Third
12	MR. CARSON: It absolutely does. How can	12	Circuit, these questions are highly relevant.
13	a jury calculate punitive damages, and how do	13	I just had the same argument the other day in
14	they know what's punitive unless they know what	14	one so -- but, again, I'll give you the
15	he's worth? It absolutely go -- the case law	15	opportunity to give your client the right
16	is pretty clear.	16	advice.
17	MR. RIESER: Seth, you can't -- you have	17	BY MR. CARSON:
18	no claim for punitive damages against --	18	Q. How much money did the Middle East Forum
19	MR. CARSON: Yes, we do. He's a defendant	19	receive in donations in 2019?
20	in the case, and we made a claim for punitive	20	A. I don't know.
21	damages.	21	Q. Where is that listed?
22	MR. CAVALIER: -- recognize that theory,	22	A. In the -- it will be listed in the 2019
23	Seth.	23	990, which is now being worked on.
24	MR. RIESER: Seth, under the PHRA there is	24	Q. 2019 990?
	Page 42		Page 44
1	---	1	---
2	MR. CARSON: First of all, under the	2	A. Yep.
3	Philadelphia Fair Practice Ordinance, there are	3	Q. Do you notify members of the board about
4	punitive damages.	4	Middle East Forum's stock portfolio, investment
5	MR. CAVALIER: Not against --	5	portfolio?
6	---	6	A. What do you mean by "members of the
7	(Indistinguishable cross-talk.)	7	board"?
8	---	8	Q. Well, the Middle East Forum has board
9	MR. CARSON: Yeah, there are, and under	9	members; is that correct?
10	the PHRA there's liquidated damages.	10	A. What do you mean by "board"?
11	MR. RIESER: Well, number one, there	11	Q. Board of directors.
12	isn't.	12	A. We don't have a board of directors.
13	MR. CARSON: Yeah, there is.	13	Q. What do you guys have in place of a board
14	MR. RIESER: It has nothing to do with his	14	of directors?
15	net worth.	15	A. I don't know. What do you mean?
16	MR. CARSON: No, it absolutely does.	16	Q. You tell me. What do you think I mean?
17	MR. RIESER: It doesn't. Then call the	17	A. I don't know what you mean. You tell me
18	judge. It's stupid. Go ahead.	18	what your question is.
19	MR. CARSON: It's not stupid.	19	Q. My question is, does the Middle East Forum
20	MR. CAVALIER: He's not gonna answer your	20	have a board of directors?
21	questions about his personal net worth.	21	A. No.
22	MR. CARSON: I mean, it's not really a	22	Q. Does the Middle East Forum have a Board of
23	choice, but I'm just gonna make a list.	23	Governors?
24	MR. CAVALIER: Well, I'm instructing --	24	A. [Inaudible].
	MR. CARSON: I'll call the judge and deal		Q. We can't hear you. You gotta speak up.

	Page 45		Page 47
1	A. Yes.	1	(Indistinguishable cross-talk.)
2	Q. Who's on the Board of Governors?	2	---
3	A. About 60, 70 people.	3	THE WITNESS: Could the court reporter
4	Q. Are there officers on the Board of	4	read me back what I said?
5	Governors?	5	---
6	A. No.	6	(Whereupon the court reporter read back
7	Q. Does the Middle East Forum have corporate	7	the pertinent testimony.)
8	officers?	8	---
9	A. Yes.	9	(Indistinguishable cross-talk.)
10	Q. Who are they?	10	---
11	A. Steven Levy and Lawrence Hollin and	11	THE COURT REPORTER: Guys, we gotta do one
12	myself, Gregg, and one or two others.	12	at a time here.
13	Q. Who are the other people?	13	BY MR. CARSON:
14	A. I don't remember.	14	Q. Are you the CEO, is the next --
15	Q. What's Steve Levy's position?	15	MR. CAVALIER: Daniel, do you wanna finish
16	A. He's chairman.	16	your prior answer?
17	Q. What's Lawrence Hollin's position?	17	THE WITNESS: I do.
18	A. I don't remember.	18	MR. CAVALIER: Then go ahead and do it.
19	Q. What?	19	THE WITNESS: The important title is
20	A. I don't remember.	20	president, and I have another title as -- in
21	Q. What's Daniel Pipes' position? Do you	21	the corporate structure but --
22	remember your position?	22	BY MR. CARSON:
23	A. Might be president; might be something	23	Q. What's that title?
24	else.	24	MR. CAVALIER: Daniel, were you finished
	Page 46		Page 48
1	Q. Well, what's your understanding of what it	1	---
2	is?	2	your answer?
3	A. I just told you. I don't -- might be	3	BY MR. CARSON:
4	president; might be something else.	4	Q. What's that title?
5	Q. Well, what might else [sic] it be if it's	5	MR. CAVALIER: Daniel, were you finished
6	not president?	6	your answer?
7	A. I don't -- it's not an important title.	7	THE WITNESS: Could the court reporter
8	My important title is I'm president of the	8	read back to me what I said?
9	organization, and I have --	9	THE COURT REPORTER: Guys, we're not gonna
10	Q. Are you -- are you the CEO?	10	do this all day, just so you know, okay?
11	A. -- interrupting me. You're inter --	11	MR. CAVALIER: I agree with you, and I
12	Q. Are you the CEO?	12	apologize on behalf of --
13	MR. CAVALIER: Seth, let him finish his	13	MR. CARSON: Then why don't you just --
14	answer.	14	why don't you like -- please, just do what
15	BY MR. CARSON:	15	everyone does before a deposition when they
16	Q. Are you the CEO?	16	have a client, and explain to your client the
17	MR. CAVALIER: Hold on a second. Daniel,	17	way the deposition works.
18	were you finished your last answer?	18	MR. CAVALIER: The way the deposition
19	MR. CARSON: He was finished.	19	works is you ask your question. He --
20	BY MR. CARSON:	20	MR. CARSON: I ask questions. He provides
21	Q. Are you the CEO?	21	answers.
22	MR. CAVALIER: Daniel, don't answer the	22	MR. CAVALIER: If you're not gonna let him
23	question.	23	answer the question, there's no point for any
24	---	24	of us to be here.
			BY MR. CARSON:

	Page 49		Page 51
<p style="text-align: center;">---</p> <p>1 Q. Are you also the CEO? It's a simple --</p> <p>2 MR. CAVALIER: That's not a question</p> <p>3 pending. He wants to finish his answer --</p> <p>4 MR. CARSON: It is the question --</p> <p>5 MR. CAVALIER: -- finish his answer before</p> <p>6 we move on to the next question, Seth. No</p> <p>7 matter how many times you try to talk over him,</p> <p>8 he's gonna finish his answers.</p> <p>9 MR. CARSON: That's good advice, Jon.</p> <p>10 BY MR. CARSON:</p> <p>11 Q. Are you the CEO?</p> <p>12 MR. CAVALIER: Daniel, do you wanna finish</p> <p>13 your prior answer?</p> <p>14 THE WITNESS: I do.</p> <p>15 BY MR. CARSON:</p> <p>16 Q. Go ahead, Mr. Pipes. What's so important</p> <p>17 that you need to get it out? Go ahead. Finish.</p> <p>18 A. The important title I have is as president</p> <p>19 of the Middle East Forum. I have perhaps that and</p> <p>20 perhaps some other title in the corporate structure.</p> <p>21 I don't remember it. It's not important.</p> <p>22 Q. Is it CEO?</p> <p>23 A. It is not CEO.</p> <p>24 Q. Well, what is it?</p>	<p style="text-align: center;">---</p> <p>1 Q. Are there MEF bylaws?</p> <p>2 A. Yes.</p> <p>3 Q. Is your other title listed in the MEF</p> <p>4 bylaws?</p> <p>5 A. I don't know.</p> <p>6 Q. Do you wanna look at them?</p> <p>7 A. If you want me to.</p> <p>8 Q. Sure, we can look at the MEF bylaws. Do</p> <p>9 you see this document I put on the screen?</p> <p>10 A. Yep.</p> <p>11 Q. Okay. Are these the MEF bylaws?</p> <p>12 A. I don't know.</p> <p>13 Q. We'll take a minute and review it.</p> <p>14 MR. CAVALIER: Seth, do you really want</p> <p>15 him to review the entire bylaws [inaudible] --</p> <p>16 MR. CARSON: I mean, the question I'm</p> <p>17 asking is, are these the bylaws?</p> <p>18 THE WITNESS: I can only --</p> <p>19 ---</p> <p>20 (Indistinguishable cross-talk.)</p> <p>21 ---</p> <p>22 BY MR. CARSON:</p> <p>23 Q. You review it until you have enough</p> <p>24 information to answer the question.</p>		
<p style="text-align: center;">---</p> <p>1 A. I don't know. It could be president; it</p> <p>2 could be something else.</p> <p>3 Q. Well, what else do you think it might be?</p> <p>4 A. I don't know.</p> <p>5 Q. Well, why do you think this other title</p> <p>6 exists then?</p> <p>7 A. There's a legal need for corporate</p> <p>8 structure.</p> <p>9 Q. Is there a document to look at where this</p> <p>10 other title is listed?</p> <p>11 A. I'm sure there is.</p> <p>12 Q. Well, what's that document?</p> <p>13 A. I don't know.</p> <p>14 Q. Is it the Middle East Forum charter?</p> <p>15 A. I don't know. If you want to look up our</p> <p>16 paperwork, our public paperwork, be glad to make it</p> <p>17 available to you.</p> <p>18 Q. That's not necessary. You already have</p> <p>19 made it available.</p> <p>20 A. I deal with the Middle East, Mr. Carson.</p> <p>21 I don't deal with the legalities of the Middle East</p> <p>22 Forum. I can give you dates what happened in the</p> <p>23 11th century. I cannot give you specifics of</p> <p>24 legalities of corporate governance of a 501(c)(3).</p>	<p style="text-align: center;">Page 50</p> <p style="text-align: center;">---</p> <p>1 A. Then let me read the entire document.</p> <p>2 Q. If you're gonna read the whole thing,</p> <p>3 we're gonna go off the record while you read it.</p> <p>4 A. Up to you.</p> <p>5 MR. CARSON: We're gonna go off the record</p> <p>6 while we read this. We're not wasting time to</p> <p>7 read the whole document.</p> <p>8 MR. CAVALIER: I disagree. We're not -- I</p> <p>9 mean, you wanna go off the record, we'll go off</p> <p>10 the record, but you're not stopping the clock</p> <p>11 while the witness reviews the document you put</p> <p>12 in front of him.</p> <p>13 MR. CARSON: Yes, we are stopping the</p> <p>14 clock.</p> <p>15 ---</p> <p>16 (Indistinguishable cross-talk.)</p> <p>17 ---</p> <p>18 MR. CAVALIER: Seth, that's not how it</p> <p>19 works.</p> <p>20 MR. CARSON: Yeah, it is how it works.</p> <p>21 MR. CAVALIER: You want him to identify a</p> <p>22 19-page document, he's gotta look at the</p> <p>23 document.</p> <p>24 MR. CARSON: It's not 19 pages.</p>	Page 52	

	Page 53	
1	---	1
2	---	2
3	(Indistinguishable cross-talk.)	3
4	---	4
5	BY MR. CARSON:	5
6	Q. Have you ever seen this document before,	6
7	Mr. Pipes?	7
8	A. I don't know. I have to see the whole of	8
9	it before I --	9
10	Q. Well, let me ask you a question: How did	10
11	these documents get to your attorney? Did you turn	11
12	them over?	12
13	A. I did not, no.	13
14	Q. Who turned them over?	14
15	A. I don't know.	15
16	Q. Well, do you know that documents were	16
17	turned over to your attorneys in this case?	17
18	A. No.	18
19	Q. You don't know whether you turned	19
20	documents over to your attorneys in this case?	20
21	A. No.	21
22	Q. Okay.	22
23	A. We have a legal counsel who handles these	23
24	things.	24
	Q. Who handled the turning over of documents	
	Page 54	
1	---	1
2	in this case?	2
3	A. You interrupted me. Legal --	3
4	Q. Who turned over the document -- handing	4
5	over the documents in this case? I didn't hear you.	5
6	A. I'd like to finish. My legal counsel	6
7	handles matters such as documents to lawyers and to	7
8	opposing counsel and so forth. I do not deal with	8
9	this. I will note again that we have 25 people at	9
10	the Forum, and we have specialized tasks, and I	10
11	don't do everything, and I don't know everything	11
12	that goes on. I make key decisions. I do not make	12
13	every single decision such as whether to hand over	13
14	bylaws to lawyers or not. So I don't know how these	14
15	went -- if these are, in fact, our bylaws -- how	15
16	they went from us --	16
17	Q. Well, how would you tell if they were?	17
18	A. I would have to read this document, and	18
19	I'd have to compare it to the documents -- the	19
20	document in my possession that says --	20
21	MR. CARSON: Then we're gonna call the	21
22	judge, Jon. This is bullshit. We're gonna	22
23	call the judge. We're not gonna spend an hour	23
24	reading a document and staying on the clock, so	24
	I'm gonna get Judge Wolson on the phone.	
	Page 55	
1	---	1
2	MR. CAVALIER: You're gonna call the	2
3	judge?	3
4	MR. CARSON: Yes.	4
5	MR. CAVALIER: Because you don't want the	5
6	witness to be able to read the document you're	6
7	presenting --	7
8	MR. CARSON: No. We're not gonna spend an	8
9	hour where he reads a four-page document and	9
10	tell me we're on the clock.	10
11	MR. CAVALIER: Not gonna take an hour.	11
12	MR. CARSON: That's not gonna happen, all	12
13	right, and we're also not gonna pretend like we	13
14	don't know that these are -- the document is	14
15	labeled "MEF Bylaws," so we're not playing	15
16	games today. So either you wanna talk to your	16
17	client, or I'm just gonna call the judge, and	17
18	the judge will make a ruling.	18
19	MR. CAVALIER: If you wanna call the judge	19
20	and tell him that you don't want the witness to	20
21	be able to read the documents that you're	21
22	putting in front of him --	22
23	MR. CARSON: I -- that's no problem.	23
24	MR. CAVALIER: Feel free.	24
	THE VIDEOGRAPHER: Counsels, are we agreed	
	Page 56	
1	---	1
2	to go off the record while --	2
3	MR. CARSON: No, let's stay on the record.	3
4	THE VIDEOGRAPHER: Sure thing, Seth.	4
5	THE DEPUTY: Good morning. Judge Wolson's	5
6	chambers. This is Jeannine.	6
7	MR. CARSON: Yeah. This is Seth Carson.	7
8	We're calling from a deposition in connection	8
9	with the Middle East Forum verse -- I'm	9
10	sorry -- Lisa Barbounis verse the Middle East	10
11	Forum. We're just having an issue with the	11
12	witness just being completely nonresponsive,	12
13	refusing to even verify documents as simple as	13
14	the Middle East Forum bylaws. We're dealing	14
15	with the president of the Middle East Forum,	15
16	and I don't know what to do, but they're --	16
17	counsel's telling me that he needs to sit and	17
18	take -- to read, you know, documents that are	18
19	four or five pages long and that we need to	19
20	stay on the record to do it, and that's gonna	20
21	count against the clock, and it's just -- we	21
22	only have one opportunity to do this	22
23	deposition, and it's just getting out of	23
24	control.	24
	THE DEPUTY: Okay. Unfortunately, the	

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1	judge is in the middle of a telephone 2 conference. Can you hold on for just a moment? 3 MR. CARSON: Sure. 4 THE DEPUTY: Thanks. 5 MR. CARSON: Your client can take as much 6 time as he wants to read documents today, but 7 we're just not gonna do it and count against 8 the clock. Not gonna spend two hours looking 9 at doc -- because there's gonna be a lot of 10 documents that are coming up, and we're not 11 gonna do that every time. It's ridiculous, and 12 I'm -- frankly, I'm sort of surprised that you 13 would even suggest it. 14 THE DEPUTY: Mr. Carson? 15 MR. CARSON: Yup. 16 THE DEPUTY: Okay. As I said, the judge 17 is in the middle of a Rule 16. I don't know if 18 you wanna try calling back, I wanna say, maybe 19 like 11:45? 20 MR. CARSON: Yeah. I can keep asking -- 21 yeah. I can keep asking other questions, and 22 then we can call the judge back. It's just 23 like, you know, the first document that I put 24 in front of the witness, you know, he said he	1 he wants to read this document, or we can keep 2 going and we can -- 3 MR. CAVALIER: It's your deposition. To 4 the extent you want him to review documents or 5 to ask -- if you wanna ask him questions about 6 documents -- 7 MR. CARSON: I'm gonna ask him questions 8 about this document, but first -- my first 9 question, is this the Middle East Forum bylaws? 10 Your client says "I don't know," which is -- 11 it's ridiculous. 12 MR. CAVALIER: He needs to read the 13 document to identify it. 14 MR. CARSON: Right. 15 MR. CAVALIER: I don't know why that's 16 such a controversial statement to you. 17 BY MR. CARSON: 18 Q. All right. Let's just time it just for 19 fun. You go ahead, Mr. Pipes. Wanna read the 20 document before you confirm it? Is this the Middle 21 East Forum bylaws, is the question. Let us know 22 when you're ready to answer. 23 A. I'm finished with this. 24 Q. So is it the MEF -- is it Middle East
	Page 58	
1	needs to take his time and read the entire 2 document before he answers any questions on it. 3 There's gonna be a lot of documents in the 4 case, so I suggested that [inaudible] hours 5 while he confirms documents, that's fine. He 6 can take all the time he wants to do that, but 7 they're trying to say that it has to count 8 against the clock, and that's -- you know what 9 I mean? It's just -- that's just patently 10 unfair, and it's clearly a strategy designed to 11 reduce the amount of questions that I'm 12 permitted to ask today. 13 MR. CAVALIER: For defense counsel, I'll 14 just note that I disagree with everything 15 Mr. Carson just said. 16 MR. CARSON: Yeah, of course you do. 17 THE DEPUTY: Okay. I would suggest that 18 you both, you know, dial in around 11:45, and I 19 could see if the judge can speak to you all at 20 one time. 21 MR. CARSON: Thank you. We'll call back. 22 I'll just keep going for now. Thank you. 23 THE DEPUTY: No problem. Thank you. 24 MR. CARSON: We can go off the record if	1 Forum's bylaws? 2 A. I'm finished with the first page. 3 MR. CAVALIER: Read the whole document. 4 THE WITNESS: No, no, no. First page, the 5 first section that you showed me. No, go back 6 up. Come on. 7 MR. CAVALIER: Still not all the way -- 8 BY MR. CARSON: 9 Q. Tell me where to go. 10 A. To the bottom -- look at the first page -- 11 Q. You just said you read the first page. 12 A. First page in the sense of first screen. 13 Q. This was the first screen, so I went down 14 to the second screen. 15 A. No, no, no. Up. Okay. 16 Q. Can you read Section I for the record out 17 loud, please? I'll highlight it for you. Can you 18 read the section out loud for the record? 19 A. Middle East Forum shall have two Boards of 20 Governors, one based in Philadelphia, and the other, 21 New York. Each shall consist of no less than 15 22 persons and no more than 45 persons or such other 23 members -- or such other number of the members of 24 each board shall, from time to time, determine.
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	Page 61		Page 63
1	<p style="text-align: center;">---</p> <p>Q. So is that the Board of Governors that you</p> <p>were just testifying to?</p> <p>MR. CAVALIER: So, just so we're clear for</p> <p>the record, are you withdrawing the question</p> <p>that the witness was answering and moving on to</p> <p>other --</p> <p>BY MR. CARSON:</p> <p>Q. I'm asking you if this is the board of</p> <p>directors -- the Board of Governors that we just</p> <p>talked about.</p> <p>A. Well, we haven't verified that this is our</p> <p>bylaws, so if you're just asking me, in general, is</p> <p>there a Board of Governors, yes, there is.</p> <p>Q. Does this document state that the Middle</p> <p>East Forum shall have two Boards of Governors?</p> <p>A. I don't know what this document is. I --</p> <p>Q. Well, does this document say that? The</p> <p>Middle East Forum will have two Boards of Governors.</p> <p>Is that what it says?</p> <p>A. This document says that. Whatever this</p> <p>document --</p> <p>Q. Why does the Middle East Forum have two</p> <p>Boards of Governors? What does that mean?</p> <p>MR. CAVALIER: Object to form. You can</p>	1	<p style="text-align: center;">---</p> <p>A. Yes.</p> <p>Q. The website has a page that's listed,</p> <p>"Middle East Forum Board of Governors". Are you</p> <p>aware of that?</p> <p>A. Yes.</p> <p>Q. And Gregg Roman's name is listed on that</p> <p>page. Do you know that?</p> <p>A. No. I think that's wrong.</p> <p>Q. Have you ever seen this web page before?</p> <p>A. Let me see the whole of it.</p> <p>Q. Do you see here where it says "Middle East</p> <p>Forum Board of Governors"?</p> <p>A. Yep.</p> <p>Q. Do you see here where it says Gregg</p> <p>Roman's name underneath that?</p> <p>A. Yup.</p> <p>Q. So does that better help your memory of</p> <p>whether Gregg Roman's a member of the Board of</p> <p>Governors?</p> <p>A. Well, I haven't verified this page, but if</p> <p>we just look at this page, it's quite clear that the</p> <p>top five names are officers, and the next 12 or so</p> <p>names are executive committee, and then comes the</p> <p>Board of Governors. And if Gregg's name is on the</p>
1	<p style="text-align: center;">---</p> <p>answer.</p> <p>THE WITNESS: Middle East Forum does not</p> <p>have two Board of Governors.</p> <p>BY MR. CARSON:</p> <p>Q. Well, how many Boards of Governors does</p> <p>the Middle East Forum have?</p> <p>A. One.</p> <p>Q. So this document says one is based in</p> <p>Philly, and the other's in New York. Was there ever</p> <p>a time when the Middle East Forum had two Boards of</p> <p>Governors?</p> <p>A. Yes.</p> <p>Q. When did they go from having two to one?</p> <p>A. Five years ago.</p> <p>Q. When did Gregg Roman become a member of</p> <p>the Board of Governors?</p> <p>A. He didn't.</p> <p>Q. Gregg Roman doesn't sit on the Board of</p> <p>Governors?</p> <p>A. No.</p> <p>Q. Is Gregg Roman a corporate officer?</p> <p>A. Yes.</p> <p>Q. You have a website online. Are you aware</p> <p>of that?</p>	1	<p style="text-align: center;">---</p> <p>Board of Governors, that would be a surprise to me.</p> <p>Q. And I'll represent to you that this --</p> <p>this is what your website looks like right now. I</p> <p>just took a screenshot of it just now.</p> <p>A. Well, I just explained to you that if it</p> <p>does -- it says that Gregg is secretary of the</p> <p>organization, and the Board of Governors are below</p> <p>it.</p> <p>Q. And if we look at the Middle East Forum</p> <p>bylaws, there is a section for officers, correct,</p> <p>right here?</p> <p>A. I don't know that this is the Middle East</p> <p>Forum bylaws.</p> <p>Q. We can pretend it's not for now. Is there</p> <p>a section in this document that says "officers"?</p> <p>A. Yes.</p> <p>Q. You are aware that your attorneys turned</p> <p>this over to us and represented that it's the Middle</p> <p>East Forum bylaws, correct?</p> <p>A. No.</p> <p>Q. I'll represent to you that that's exactly</p> <p>what happened. Do you see this little number right</p> <p>here? Do you see this?</p> <p>A. I do.</p>

	Page 65		Page 67
1	---	1	responses to requests for production of
2	Q. Do you know what that's called? It's	2	documents, right?
3	called a Bates stamp. I'll represent to you that	3	MR. CAVALIER: Sure.
4	your attorneys put this number on this page and	4	MR. CARSON: So you do know that you
5	turned it over to us in connection with our requests	5	represented that this is the Middle East Forum
6	in this case. Did you know that?	6	bylaws, correct?
7	A. No.	7	MR. CAVALIER: Listen. I'm not -- the
8	Q. Your attorneys never talked to you about	8	discovery speaks for itself --
9	discovery?	9	---
10	MR. CAVALIER: Objection. Daniel, you	10	(Indistinguishable cross-talk.)
11	don't have to --	11	---
12	---	12	MR. CARSON: I get it, I get it. It's
13	(Indistinguishable cross-talk.)	13	fine.
14	---	14	BY MR. CARSON:
15	MR. CARSON: You can just say	15	Q. So you are aware that this document does
16	"privileged," Jon. It's fine.	16	have a section called "Officers," correct,
17	MR. CAVALIER: Yeah.	17	Mr. Pipes?
18	MR. CARSON: Objection, privilege.	18	A. I see in front of me it says "Officers,"
19	BY MR. CARSON:	19	yes.
20	Q. Okay. So did you ever work on producing	20	Q. And these -- chairman, vice chairman,
21	discovery in this case in any way?	21	president, vice president, secretary, treasurer, are
22	A. No.	22	those the offices that the Middle East Forum
23	MR. CAVALIER: Object to form.	23	maintains for its officers?
24	BY MR. CARSON:	24	MR. CAVALIER: Object to the form of the
	Q. Did you ever have to respond to -- do you		Page 68
	know what interrogatories are?	1	---
1	A. No.	1	question.
2	Q. Do you know what a request for production	2	THE WITNESS: I'd have to check.
3	of documents is?	3	BY MR. CARSON:
4	A. No.	4	Q. Where would you check?
5	Q. So you've never responded to	5	A. I would check our documents.
6	interrogatories, then? Is that your testimony?	6	Q. Would you check with the Middle East Forum
7	MR. CAVALIER: Objection.	7	bylaws?
8	BY MR. CARSON:	8	A. No. I would check to see what our current
9	Q. Have you ever responded to	9	officers are.
10	interrogatories?	10	Q. Well, what document would you check that
11	A. No.	11	would tell you that?
12	Q. Have you ever responded to a request for	12	A. I would check the internal documents of
13	production of documents?	13	the Middle East Forum.
14	A. No.	14	Q. Well, what are the internal documents you
15	Q. Well, do you see how this document here,	15	would check? Please identify one.
16	which your attorneys are representing to us is the	16	A. We keep lists of who is doing what.
17	Middle East Forum bylaws, do you see it has a	17	Q. And is one of those lists have a job
18	section for "officers"?	18	called -- a position called secretary?
19	MR. CAVALIER: I'm gonna object to the	19	A. Yeah. I told you that. Gregg is the
20	description of the document, but to the extent	20	secretary.
21	you can answer the question, go ahead.	21	Q. Okay. And Gregg is also the director of
22	MR. CARSON: You -- Jon, you do know that	22	the Middle East Forum, correct?
23	you guys gave us written requests -- written	23	A. Correct.
24		24	Q. Is there any position at the Middle East

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<p style="text-align: center;">---</p> <p>1 Forum that's higher than director in the corporate 2 structure?</p> <p>3 A. I'm the president of the -- making -- I'm 4 the president. Yeah.</p> <p>5 Q. So it's your testimony that you are 6 positioned higher in the corporate structure than 7 the director of the Middle East Forum?</p> <p>8 A. Yes.</p> <p>9 Q. Is there anybody else who's positioned 10 higher?</p> <p>11 A. The chairman is the highest position in 12 the corporate structure.</p> <p>13 Q. Who's the chairman?</p> <p>14 A. Steven Levy.</p> <p>15 Q. So Steven Levy is positioned above you in 16 the corporate structure; is that your testimony?</p> <p>17 A. Yes.</p> <p>18 Q. When did he become the chairman?</p> <p>19 A. I don't remember.</p> <p>20 Q. Well, how long have you worked with Steve 21 Levy for?</p> <p>22 A. I don't remember.</p> <p>23 Q. We can't hear you when you whisper, 24 Mr. Pipes.</p>		<p style="text-align: center;">---</p> <p>1 of taking his penis out in front of her?</p> <p>2 MR. CAVALIER: I'm gonna object to the 3 form there.</p> <p>4 BY MR. CARSON:</p> <p>5 Q. We can listen to the recording if you'd 6 like, Mr. Pipes.</p> <p>7 A. I don't know that.</p> <p>8 Q. We can do that on the record.</p> <p>9 A. If you like.</p> <p>10 Q. Sorry? What's your answer?</p> <p>11 A. If you like.</p> <p>12 Q. Well, did you know that she accused Gregg 13 Roman of taking his penis out in front of her at a 14 bar in Washington D.C.?</p> <p>15 MR. CAVALIER: Object to the form.</p> <p>16 THE WITNESS: No, I don't.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. You didn't know that?</p> <p>19 A. No. I know that -- no, I don't know that.</p> <p>20 Q. If you knew that, would you have 21 investigated it?</p> <p>22 A. I am not now or at any time in the next 23 few hours going to deal with hypotheticals. If 24 you --</p>	
	Page 70		Page 72
<p style="text-align: center;">---</p> <p>1 A. I don't remember.</p> <p>2 Q. Did you start working with him this year?</p> <p>3 A. No.</p> <p>4 Q. Did you start working with him last year?</p> <p>5 A. Earlier.</p> <p>6 Q. Early last year is when you began working 7 with Mr. Levy; is that your testimony?</p> <p>8 A. I've worked with him for some years. I 9 cannot be precise when I first --</p> <p>10 Q. Did you work with him at all times related 11 to the allegations in this case?</p> <p>12 A. Yes.</p> <p>13 Q. Did you work with him while Tiffany Lee 14 was still an employee of the Middle East Forum?</p> <p>15 A. Probably.</p> <p>16 Q. Did you work with him while Gabrielle 17 Bloom was still an employee of the Middle East 18 Forum?</p> <p>19 A. I don't know who Gabrielle Bloom is.</p> <p>20 Q. Do you know who Alana Goodman is?</p> <p>21 A. I know the name as a reporter.</p> <p>22 Q. You know the name what?</p> <p>23 A. As a reporter.</p> <p>24 Q. Do you know that she accused Gregg Roman</p>		<p style="text-align: center;">---</p> <p>1 Q. That's --</p> <p>2 A. Let me finish.</p> <p>3 Q. That's not a choice you have today, 4 Mr. Pipes.</p> <p>5 A. Let me finish.</p> <p>6 MR. CAVALIER: Let him finish his answer.</p> <p>7 MR. CARSON: His answer was, I'm not now 8 gonna deal with hypotheticals today.</p> <p>9 BY MR. CARSON:</p> <p>10 Q. That's not a choice that you have today, 11 Mr. Pipes. You have to answer the questions 12 honestly and truthfully to the best of your ability.</p> <p>13 You don't get to decide if there's an entire 14 category of questions that you're not gonna respond 15 to.</p> <p>16 ---</p> <p>17 (Indistinguishable cross-talk.)</p> <p>18 ---</p> <p>19 MR. CARSON: So will not answer 20 hypotheticals. Okay.</p> <p>21 BY MR. CARSON:</p> <p>22 Q. Did you wanna tell me anything else about 23 how you will not answer hypotheticals?</p> <p>24 MR. CAVALIER: Is that a question?</p>	

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1	THE WITNESS: Read me back what I started 2 to say. 3 BY MR. CARSON: 4 Q. You said, I will not now or today respond 5 to hypotheticals. Is there something else you 6 wanted to say in response to that? 7 A. In each case, it's a matter of when, 8 where, who, and other specifics, and, therefore, 9 answering hypotheticals is a mistake, and I'm not 10 gonna engage in it. 11 Q. Well, at 11:45 we're gonna talk to the 12 judge, and if he instructs you to answer 13 hypotheticals, will you answer them? 14 MR. CAVALIER: Objection. 15 THE WITNESS: If you give me specifics 16 about who, when, where, and every detail, then 17 I can perhaps make a judgment, but I can't make 18 a judgment [inaudible]. 19 BY MR. CARSON: 20 Q. Another nonresponsive answer, okay. So if 21 you would've known that there was an allegation -- 22 whether it was true or not, if you just would've 23 heard that there's an allegation that the director 24 of the Middle East Forum took his penis out in front	1	MR. CAVALIER: Object to form. 2 THE WITNESS: If Gregg Roman said he would 3 give stories to a reporter, is that within the 4 purview? Yes. 5 BY MR. CARSON: 6 Q. Because one of the jobs of the director of 7 the Middle East Forum is to work with the press; is 8 that correct? 9 A. Correct. 10 Q. If Gregg Roman said he's gonna trade those 11 stories for sex, is that something that's within the 12 purview of the director of the Middle East Forum? 13 A. No. 14 Q. So if you found out that he was making 15 propositions to reporters to trade stories for sex, 16 is that something you think you should've 17 investigated? 18 A. Depends on the exact circumstances. 19 Q. I'm gonna play a recording that was turned 20 over to your attorneys in the course and scope of 21 discovery. 22 - - - 23 (Whereupon an audio recording was played 24 from 11:20 a.m. to 11:31 a.m.)
1	Page 74 - - - of a Washington Examiner reporter, is that something 2 that you think you should've investigated? 3 A. It depends on the specifics -- when, 4 where, who, what the relations were, what the 5 background is, and so forth. I'm not gonna make a 6 determination on the abstract. 7 Q. Under what context would it be appropriate 8 for the director of the Middle East Forum to take 9 his penis out in front of a Washington Examiner 10 reporter? 11 MR. CAVALIER: Objection to form. We're 12 getting close to starting to hear instructions 13 from me not to answer, Seth. 14 MR. CARSON: Yeah. Based on what, 15 privilege? 16 MR. CAVALIER: No. Based on the fact that 17 these questions are ludicrous. 18 MR. CARSON: They're not ludicrous. 19 BY MR. CARSON: 20 Q. Mr. Pipes, tell me -- so I'll give you a 21 context. If Gregg Roman was telling a Washington 22 Examiner reporter that he would give her stories, is 23 that something that would be within the purview of 24 the director of the Middle East Forum?	1	Page 76 - - - BY MR. CARSON: 3 Q. Have you ever heard that recording before, 4 Mr. Pipes? 5 A. No. 6 Q. Is that a recording that you would've been 7 interested in hearing? 8 MR. CAVALIER: Objection. Form, 9 foundation. 10 BY MR. CARSON: 11 Q. Is that something you wished you would've 12 known that someone alleged? 13 MR. CAVALIER: Same objections. 14 THE WITNESS: I don't know if this is 15 legal recording. I don't know if this is 16 legitimate recording. I don't know if this 17 person speaking was paid to act this out. I 18 know nothing about it. 19 BY MR. CARSON: 20 Q. Forgetting about the truth of anything 21 said, wouldn't that be something you'd wanna be 22 aware of? 23 MR. CAVALIER: Objection. Form, 24 foundation, incomplete hypothetical. You can

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1	answer if you can.	1	position, other than you, to make sure that the
2	THE WITNESS: I'm the president of the	2	female employees who work for the Middle East Forum
3	Middle East Forum.	3	aren't subjected to illegal conduct?
4	BY MR. CARSON:	4	MR. CAVALIER: Object to form, foundation.
5	Q. Right.	5	THE WITNESS: I have yet [inaudible].
6	A. Interrupt me.	6	THE COURT REPORTER: I'm sorry, Mr. Pipes.
7	Q. You're the president of Middle East Forum.	7	I cannot hear you.
8	Continue.	8	THE WITNESS: I have yet to be shown
9	A. I am not the den mother of the Middle East	9	illegal conduct, and that illegal conduct is
10	Forum. The employees at the Forum engage in all	10	specific in time and place.
11	sorts of activities that I know nothing about that I	11	BY MR. CARSON:
12	probably wouldn't approve of. If this is accurate,	12	Q. Well --
13	I wouldn't approve of it. If I learned that Lisa	13	A. What illegal conduct have you shown me?
14	Barbounis goes and picks up men at a dinner, takes	14	Q. Is sexual harassment illegal conduct?
15	them back to her hotel room, and has sex with them	15	A. I don't know that what was described in
16	that night, probably wouldn't approve of that	16	that tape recording of unknown providence with
17	either. These are not my concerns. I do not deal	17	unknown people is illegal activity. If it is, I
18	with the personal lives of my staff. I don't know	18	would be concerned, but I didn't know about it, and
19	them in that way. I'm not concerned with their	19	I, at this point, have my doubts about its
20	activities. If they do something that I don't like	20	authenticity.
21	and I know about it, I'll tell them, but I am not	21	Q. Why do you have your doubts about its
22	den mother of the Middle East Forum.	22	authenticity?
23	Q. But don't you have a legal duty to the	23	A. I told you before. I don't know if this
24	employees who've worked with Gregg Roman?	24	was paid for, if this was an actress. I don't know
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1	MR. CAVALIER: Object to form, foundation.	1	if it was done legally in a place where one or both
2	BY MR. CARSON:	2	of the speakers have to get an agreement. I don't
3	Q. Don't you owe -- strike that. Don't you	3	know any of these things.
4	have a responsibility, an ethical responsibility, to	4	Q. What would it take to find out, though?
5	the employees who work with Gregg Roman?	5	You just pick up the phone and call Alana Goodman,
6	MR. CAVALIER: Same objection.	6	correct?
7	THE WITNESS: [Inaudible].	7	A. I don't know if this was Alana Goodman.
8	BY MR. CARSON:	8	Q. Well, you heard her say that she referred
9	Q. I'm sorry?	9	to herself as Alana in the recording. Like she
10	A. To do what?	10	said, Alana, tell him what you should have -- tell
11	Q. To protect them.	11	him why you should have the story. You heard her
12	MR. CAVALIER: Same objection. Form.	12	say that, right? So we heard her first name.
13	THE WITNESS: [Inaudible].	13	A. What are you asking me?
14	BY MR. CARSON:	14	Q. I'm asking you that to authenticate its --
15	Q. I'm sorry?	15	the veracity of the recording. It's just a simple
16	A. Protect whom from who?	16	phone call from you to Alana Goodman, right?
17	Q. I'll try to make my point. Is there	17	MR. CAVALIER: Object to form, foundation.
18	anyone else who could fire Gregg Roman other than	18	You can answer.
19	you?	19	BY MR. CARSON:
20	A. No.	20	Q. It's all right. You can --
21	Q. Is there anyone else who could discipline	21	A. I don't know if that's the case or not. I
22	Gregg Roman other than you?	22	don't know if she would talk to me. I don't know if
23	A. No.	23	she would authenticate it. I don't know.
24	Q. So is there anyone else who's in a	24	Q. And the reason you don't know is because

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1	you never tried? 2       MR. CAVALIER: Object, foundation. He 3       never heard the recording before today. 4 BY MR. CARSON: 5       Q. You never tried calling Alana Goodman; is 6       that correct? 7       A. [Inaudible]. 8       THE COURT REPORTER: I can't hear you, Mr. 9       Pipes. 10      THE WITNESS: I have not called Alana 11       Goodman. 12 BY MR. CARSON: 13      Q. Also, you're being recorded. This is a 14       video dep, and I don't know if it's the green screen 15       effect you have going on, but it's -- we're not 16       getting a -- we're not getting a good video because 17       of it, so we gotta [inaudible]. If you wanna use 18       the green screen, I think you gotta sit more so on 19       the chair. Have you ever read the charge of 20       discrimination that Lisa Barbounis filed in this 21       case? 22       A. Yes. 23       Q. Have you ever read the complaint Lisa 24       Barbounis filed in this case?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	you concocted, yes. BY MR. CARSON: Q. What do you mean by "concocted"? A. Imagined, made up. Q. You think I used magic to make the complaint? A. No. You used your imagination. Q. Excuse me? We can't hear you. A. You used your imagination. Q. You think that I used my imagination to draft a complaint? That's your testimony? A. I do. Q. Why? A. You put things in that are clearly false. Q. Like what? A. Like saying that I was the one who asked Gregg to come back. It was my initiative -- my initiative -- to have Gregg come back in March 2019, omitting Lisa Barbounis' initiation on that. She simply disappeared. Q. Mr. Pipes, did -- MR. CAVALIER: He's not done his answer. BY MR. CARSON: Q. Were you done? You can keep going if you
1	----- A. Yes. Q. So you do know about the allegations that Alana Goodman made, correct? MR. CAVALIER: Object to form, foundation. MR. CARSON: Well, they are listed -- MR. CAVALIER: That's a mischaracterization of the documents you just asked him about. MR. CARSON: Well, the allegations are in those documents, correct? MR. CAVALIER: Well, they're allegations by Lisa Barbounis -- MR. CARSON: Jon, why are you answering for him? MR. CAVALIER: I'm making an objection -- ----- (Indistinguishable cross-talk.) ----- MR. CARSON: You're answering the question. THE COURT REPORTER: Guys, we gotta do one at a time. MR. CARSON: Don't answer questions. THE WITNESS: I read the complaint that	Page 82	----- want. A. I'm done. Q. Yeah, I thought you were done. MR. CARSON: Please don't interrupt us again, Jon, all right? You can put objections on the record. That's what you're allowed to do in -- MR. CAVALIER: You keep interrupting the witness. I'm gonna keep letting him finish his answer. MR. CARSON: He just corrected you, Jon. He just said he wasn't interrupted. MR. CAVALIER: One time out of 60. MR. CARSON: Well, you know, if you're gonna interrupt, you gotta get it right all the time. BY MR. CARSON: Q. All right. So, Mr. Pipes, was Lisa in a position to make a decision to have Gregg Roman return to the Middle East Forum? A. I said "initiate". You had in that complaint that I initiated -- that I, on my own, with no role taken by Lisa Barbounis -- I had the idea, implying -- and this is a very crucial point

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<p style="text-align: center;">---</p> <p>1 to these lawsuits -- that I inflicted Gregg on Lisa  2 and the others when, in fact, it was her idea. She  3 came to me. I held a meeting with all the staff,  4 with the administrative staff, and Lisa took the  5 lead and said we want Gregg back. I said good.  6 Good idea. And everyone but Marnie was enthusiastic  7 about it. Marnie didn't like it -- fair enough --  8 but it was Lisa who did it, and your concocted  9 complaint simply makes her disappear from that. It  10 has to be my decision. When I saw that, I realized  11 that this is a bogus case. I realized this is a  12 case where you brought together five women to bring  13 a lawsuit against the Middle East Forum for almost  14 \$31 million, and I realized that you are the one  15 behind it. Fine, okay. That's your work, but it's  16 a concoction. It's a fantasy. It's --</p> <p>Q. Do you have any other reasons why you think it's a concoction besides that?</p> <p>A. Oh, there are plenty more.</p> <p>Q. Well, go ahead. Tell us all the reasons why you think this case is a concoction.</p> <p>A. Because that was the first one that signaled to me that this is a falsehood.</p> <p>Q. Well, what's the second one?</p>	<p style="text-align: center;">---</p> <p>1 THE COURT REPORTER: Sir, I cannot hear  2 you.</p> <p>3 BY MR. CARSON:</p> <p>4 Q. Can't hear what you're saying.</p> <p>5 A. If you want all my objections, we have to  6 pull out this document and go through it paragraph  7 by paragraph, which is something I don't think you  8 want to do. So let me say that this was the initial  9 trigger that told me that this is a false document,  10 and it talked about something about me, not about  11 Gregg or anyone else. It was about me, and it was  12 false, false to the core, on a critical, critical  13 [inaudible]. Therefore, I see this as a bogus  14 undertaking that you've initiated.</p> <p>15 Q. Are you finished?</p> <p>16 A. I'm finished.</p> <p>17 Q. Okay. Please, if you can remember, and --  18 listen. We can look at the complaint sometime  19 today. But, right now, as you stand here today, I'm  20 asking if you can think of any other reasons why you  21 think this is a concocted complaint besides the one  22 you already testified to.</p> <p>23 A. I can.</p> <p>24 MR. CAVALIER: Object to form. Dan, you</p>	Page 86	Page 88
<p style="text-align: center;">---</p> <p>A. That's -- I'll stick with that.</p> <p>Q. Well, Mr. Pipes, this is your deposition, so if you think that the complaint presents facts that you don't agree with, I'd like you to say all the reasons why you think that the complaint is concocted.</p> <p>MR. CAVALIER: Hold on a second. Hold on, Daniel. Hold on. I'm gonna object to the form, and I'm gonna object to foundation. Unless you revise the question, I'm gonna instruct him not to answer. You're asking him to identify all the issues in a 500-paragraph complaint?</p> <p>BY MR. CARSON:</p> <p>Q. I'm asking you to tell me all the reasons why you think the complaint is concocted. So far, you've given me one. You said because the complaint states that it was your decision to bring Ms. Bar -- to bring Gregg Roman back.</p> <p>A. Not that I -- my decision it was, yes, but that I originally -- you whitewashed her out of the story is the reason. All my doing when, in fact, it was her initiative. That's all my -- all my problems [inaudible] --</p>	<p style="text-align: center;">---</p> <p>1 can answer if you can.</p> <p>2 THE WITNESS: I can, yes.</p> <p>3 BY MR. CARSON:</p> <p>4 Q. You can?</p> <p>5 A. I can.</p> <p>6 Q. Okay. So, please, what's -- give us another reason.</p> <p>8 A. I believe that one suffices because that's what told me that this is a bogus undertaking, that --</p> <p>11 Q. I'm gonna give you the opportunity -- I'm sorry. Are you finished?</p> <p>13 A. I'm finished.</p> <p>14 Q. I'm gonna give you the opportunity because if you think this is a concocted complaint, I want you to be able to tell -- say on the record why. So I'll give you the opportunity. Can you think of any other reasons right now, other than the reason that you provided us, why this is a concocted complaint?</p> <p>20 A. Yes.</p> <p>21 Q. So what is it?</p> <p>22 A. I would rather stick with just this one, and if we wanna go through the document, we can go through it, and I'll give you all my complaints.</p>		

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1	There are many, but I do not remember them all.	1	which we did, and I had the conclusion that
2	Q. You can't remember any other ones right	2	with everyone's assent, happiness -- with
3	now, right?	3	exception of Marnie Meyer -- he resumed some of
4	A. I remember this one specifically as the	4	his duties that were ended in November, five
5	most important, as the one that most directly	5	months earlier.
6	involved me.	6	THE COURT REPORTER: Seth, are you
7	Q. So let's talk about that one since it's	7	talking? I'm going off the stenographic
8	the only one that you're able to testify about right	8	record. I can't hear you at all.
9	now. Did Lisa Barbounis have the authority to bring	9	---
10	Gregg Roman back to the Middle East Forum after he	10	(Discussion was held off the record.)
11	was ejected in November of 2018?	11	---
12	MR. CAVALIER: I'm gonna object to the	12	BY MR. CARSON:
13	form.	13	Q. The question that I asked that I don't
14	BY MR. CARSON:	14	think anyone heard is, isn't it true that the
15	Q. I can set it up. Was Gregg Roman ejected	15	decision for some of those restrictions to be
16	from the Middle East Forum in November of 2018? And	16	lifted, that was ultimately your decision, right?
17	by "ejected," I mean physically not allowed to show	17	A. Yes.
18	up at the office anymore.	18	Q. And so the problem you have with the
19	MR. CAVALIER: Same objection.	19	complaint is that you don't think it adequately
20	THE WITNESS: Yes.	20	explained that you made that decision at the
21	BY MR. CARSON:	21	suggestion of Lisa Barbounis; is that correct?
22	Q. So after -- were there other conditions of	22	MR. CAVALIER: Object to form. You can
23	Gregg Roman's continued employment with the Middle	23	answer.
24	East Forum in November 2018 other than not being	24	THE WITNESS: I didn't -- I didn't use the
	Page 90		Page 92
1	able to visit the office anymore?	1	word -- I wouldn't use the word "adequate". It
2	A. Yes.	2	hid, it disguised, it made disappear the
3	Q. At some point in time, you lifted those	3	critical fact that Lisa Barbounis, with the
4	restrictions, correct?	4	enthusiastic support of Tricia McNulty, wanted
5	A. Some of them.	5	Gregg back in the office. The narrative is
6	Q. And it's your testimony that you lifted	6	entirely different if they came to me in
7	those restrictions at the suggestion of Lisa	7	November and I excluded him, and then I
8	Barbounis, correct?	8	unilaterally brought him back in -- partially
9	MR. CAVALIER: Object to form.	9	brought him back in March, to their dismay, as
10	BY MR. CARSON:	10	your complaint suggests. That's one version,
11	Q. Is that your testimony?	11	and the other is that they, particularly Lisa
12	A. Yes.	12	Barbounis, initiated this, and Tricia McNulty
13	Q. Use whatever word you want -- suggested,	13	enthusiastically agreed to it. It's a very
14	initiated.	14	different story. You distorted the history of
15	A. She initiated it. She came to my office	15	what happened, and when I saw that, I realized
16	and said, I think we need Gregg back.	16	that this is a falsehood, that this is a tissue
17	Q. Okay. So --	17	of lies.
18	A. [Inaudible].	18	BY MR. CARSON:
19	THE COURT REPORTER: Sir, I can't hear	19	Q. Based on that, you decided that none of
20	you.	20	these women were ever subjected to any inappropriate
21	THE WITNESS: I said, oh, that's a	21	conduct?
22	surprise. Let's pursue this. Let's have a	22	A. I didn't -- I didn't reach that
23	meeting of all the administrative staff	23	conclusion. I reached the conclusion that this is
24	tomorrow and pursue this and discuss this,	24	an untrustworthy document and that their testimony

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1	and your writing it up were dishonest.	1	and, indeed, the only report I heard about that was
2	Q. When Mr. Roman was brought back to the	2	from Marnie Meyer in a memo, handwritten memo, she
3	Middle East Forum, did any of the women still	3	wrote to me on the 1st of November, in which she
4	require or ask that certain conditions be -- remain	4	said that she thought there was something weird that
5	in place to -- for the -- period -- that certain	5	happened in Israel and that she asked Lisa,
6	conditions remain in place?	6	point-blank, "Did Gregg hit on you" -- quote,
7	MR. CAVALIER: Object to form.	7	unquote -- and Lisa -- Marnie reports, quote, "Lisa
8	THE WITNESS: I don't remember that any	8	said no," unquoted. So the very first report I had,
9	did. I do remember that I did keep certain	9	I've ever heard, of anything going on denied that
10	conditions in place. The basic problem, as I	10	this was, in fact, a sexual encounter of some sort
11	understood it, is that Gregg had become too	11	in Israel. Then I dealt with it. I dealt with it
12	close to his staff. I have been the head of an	12	quickly and thoroughly, and there were no more
13	organization now for 34 years, and I have	13	complaints until you, Mr. Carson, turned up and came
14	always kept my distance. It did not seem to me	14	up with five [inaudible] to demand \$31 million from
15	a good idea to become friends and to have close	15	the Middle East Forum. We were doing just --
16	relations with my staff, so I have kept away.	16	Q. Wait, wait. I don't -- can you hear that,
17	He did not do that. He became friends with	17	because I can't hear him. I heard you say "until
18	them, and that led to all sorts of	18	you, Mr. Carson," and then he broke up.
19	complications, and all that I did in November	19	A. You found five plaintiffs and demanded
20	of 2018 was say, no more friendship -- not that	20	\$31 million -- 30,800,000-some dollars -- and we
21	[inaudible] -- but end this. No more	21	have these lawsuits. But it is clear to me that
22	fraternizing. You are not to do this. And he	22	these are concocted accusations. Lisa is quoted in
23	didn't do it. And, indeed, the point of the	23	November 2018 saying to Marnie -- no -- she is --
24	March meeting was that everyone said they had	24	Marnie quotes her in November saying, back in March
	Page 94		Page 96
1	no complaints about him since November, no	1	or April, Lisa said no, there was no problem. So I
2	complaints. Let me make that point. Before	2	am very skeptical about this entire thing. Let me
3	November 1st, 2018, I never heard any	3	go further and say that Marnie reported to me back
4	complaints about him, and we had five, six days	4	in November 2018, Lisa said that -- Lisa said that
5	of intense discussion, and I said he's on	5	Gregg had touched her with his foot on her backside.
6	probation, and if I hear any complaints and if	6	Marnie said that Gregg -- she couldn't remember, but
7	I -- I will look at them very closely, and if I	7	Gregg -- her conversation with Gregg ended with her
8	find that he has done -- he has trespassed,	8	saying to Gregg, "Gregg, I'm not going to sleep with
9	he's out. I heard nothing, and after March --	9	you". Tricia reported to me that Gregg was too
10	BY MR. CARSON:	10	close to her on a couch in a room full of people.
11	Q. Can you just say the time that you're	11	So, yeah, Lisa's is a problem, except that I had it
12	talking about? You heard nothing from when till	12	already from Marnie that she had denied that back
13	when?	13	when it happened. Marnie's was clearly not an
14	A. I heard nothing before November 1st. I	14	issue. It was, "I said to him I wasn't gonna sleep
15	heard nothing after November, say, 5th or 6th. I	15	with him". It's hardly a major topic. And Tricia
16	heard nothing after March -- before March 9th, after	16	said that he was too close to her on a crowded
17	March 9th. All the complaints came in the early	17	couch. Laterally, she said that he tried to touch
18	part of November 2018. There were otherwise no	18	her bottom. She didn't tell me that. She changed
19	complaints against him so -- also, it's worth noting	19	her story afterwards. So with all this evidence
20	that, in 2018, I was hearing complaints, in	20	coming from the plaintiffs themselves, I'm very
21	particular from Lisa Barbounis, about the trip to	21	skeptical of this, and I -- and then you brought in
22	Israel that happened, I think, in March or April of	22	two others, Delaney Yonchek and Caitriona Brady,
23	that year, seven or eight months earlier. I had not	23	both of whom had no complaints whatsoever through
24	heard about it at the time. She did not come to me,	24	this entire process until you convinced them that,

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	<p style="text-align: center;">---</p> <p>1 oh, Gregg sexually assaulted them. That's what you  2 put in the complaint, and then they denied it in  3 their depositions. So this is all manufactured.  4 Mr. Carson, you're good at your work. You can turn  5 nothing into something. You can turn no problems  6 into a giant problem that convulses the lives of  7 both the plaintiffs and the defendants.  8 Congratulations on your excellent work.</p> <p>9 Q. Are you sure that Caitriona Brady and  10 Delaney Yonchek claimed that they were sexually  11 assaulted in their complaints?</p> <p>12 A. It's in there. Yeah.</p> <p>13 Q. I'll represent to you it's not in there.  14 They never made those claims to me, and they never  15 made those claims in their complaints or their  16 charges.</p> <p>17 A. We can check, but you have --</p> <p>18 Q. When you said -- I'm sorry. Go ahead.</p> <p>19 A. We can check it. Maybe I have the wording  20 wrong.</p> <p>21 Q. When you say \$31,000 -- I'm sorry -- when  22 you say \$31 million, I think you might be referring  23 to something called a 26(f) report. Do you know  24 what that is?</p>	<p style="text-align: center;">---</p> <p>1 million dollars at some point? Not admitted -- I'm  2 sorry -- strike that. So they represented that  3 they'd be willing to settle for a number under a  4 million dollars for all of them; did you know that?  5 A. Later, they did come down, yes, but the  6 initial figure was enormous, and given the two facts  7 that this would break all of us financially and was  8 based on a tissue of lies, I decided to [inaudible].</p> <p>9 THE COURT REPORTER: You decided what?</p> <p>10 THE WITNESS: To fight it, and that's what  11 we are doing.</p> <p>12 BY MR. CARSON:</p> <p>13 Q. Well, do you know that when the offer to  14 resolve these cases, all of them, for somewhere  15 south of a million dollars, that was before any of  16 the complaints were filed in the court?</p> <p>17 A. I do not.</p> <p>18 Q. You didn't know that, okay. So at some  19 point in time you reached out to Lisa Barbounis and  20 asked her to meet you at 30th Street Station; is  21 that correct?</p> <p>22 A. Yes.</p> <p>23 Q. And when you were there, you told Lisa  24 Barbounis that you two have the same problem. Do</p>	
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	<p style="text-align: center;">---</p> <p>1 A. I do not.</p> <p>2 Q. So I don't want you to tell me anything  3 your attorneys told you, but have you ever seen a  4 document from the plaintiff where they -- where  5 anyone -- where anyone asks for \$31 million?</p> <p>6 A. I saw additions of nine, nine, nine,  7 three-something -- millions, these all are -- and  8 some other amount, and it came out to 30 million,  9 eight-hundred-some thousand -- 33,000.</p> <p>10 Q. There's a document that a plaintiff has to  11 fill out and a defendant has to fill out in a case  12 called a 26(f) report, which is a -- it's -- it's in  13 the Federal Rules of Civil Procedure under like  14 self-reporting disclosures. Do you know anything  15 about that?</p> <p>16 A. I do not. I was given this figure from  17 legal source, and I'm just using it. I have the  18 numbers that add up to 31, but I don't -- I don't  19 know the details.</p> <p>20 Q. So did you know that all the plaintiffs,  21 all together, represented that they would be willing  22 to resolve these matters for a number between a  23 hundred thousand and a million? So they admitted  24 that, all together, the cases aren't even worth a</p>	<p style="text-align: center;">---</p> <p>1 you remember that?</p> <p>2 A. What are you referring to?</p> <p>3 Q. You said to Lisa that you and Lisa have  4 the same problem. Do you remember that?</p> <p>5 MR. CAVALIER: Form.</p> <p>6 THE WITNESS: No.</p> <p>7 BY MR. CARSON:</p> <p>8 Q. I was just wondering if, by that  9 "problem," you were referring to me since you just  10 testified that I'm the reason why these cases are --  11 were brought.</p> <p>12 A. Yeah. Now that you explain, yes, I do  13 believe you are a mutual problem. Yes.</p> <p>14 Q. Okay. That's a new one.</p> <p>15 A. You have [inaudible] --</p> <p>16 ---</p> <p>17 (Indistinguishable cross-talk.)</p> <p>18 ---</p> <p>19 THE WITNESS: You have made our lives  20 difficult.</p> <p>21 BY MR. CARSON:</p> <p>22 Q. Okay.</p> <p>23 A. She told me, said, "My life is a wreck.  24 My future is in question". She didn't name you, but</p>	

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1	the implication was very clear. Had these -- - - - 3 (Indistinguishable cross-talk.) 4 - - - 5 BY MR. CARSON: 6 Q. -- conversation with you about it, but 7 we're not permitted to do that. Can we take a 8 five-minute bathroom break, just a little -- I'm 9 sorry. Finish. Go ahead. 10 A. She said to me that her life is disrupted 11 and her future is in question because of these 12 lawsuits, and I ascribe these lawsuits to you. 13 Q. Okay. I think that -- isn't another way 14 to look at it is that it's because of the -- you 15 know, the unlawful conduct that they were subjected 16 to that caused them to bring the lawsuits? 17 MR. CAVALIER: Is that a question? 18 MR. CARSON: Yeah. You don't have to 19 answer that. Do you guys mind if we do like a 20 five-minute bathroom break? 21 MR. CAVALIER: I'd rather do ten. 22 MR. CARSON: That's fine, Jon. 23 MR. CAVALIER: All right, great. Thanks, 24 Seth. So 12:10, back on?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	MR. CAVALIER: Object to form. You can answer. THE WITNESS: I believe it was November 1st. After receiving the memo from Marnie, I asked everyone to be in the office, and I interviewed everyone one-on-one. BY MR. CARSON: Q. So do you remember when you received that memo from Marnie? A. November 1st, 2018. Morning. Q. And how did you receive that memo? A. Email. Q. And by the memo, I think you're referring to -- like it was a few pages, a handwritten statement by Marnie Meyer? A. That's right. Q. And, based on that email, you interviewed who? A. Everyone in the office. Q. So that -- that would include -- interviewed -- you interviewed Marnie Meyer? A. Yes. Q. And did you interview Patricia McNulty? A. Yes.	Page 103	
1	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	MR. CARSON: Okay. Thank you, guys. I just -- I have a little emergency I gotta go take care of. THE VIDEOGRAPHER: We are now off the record. - - - (Whereupon there was a recess in the proceeding from 11:58 a.m. to 12:15 p.m.) - - - THE VIDEOGRAPHER: The time is 12:15 Eastern Time, and we are now on the record. THE COURT REPORTER: Seth, you're muted, by the way. BY MR. CARSON: Q. Okay. So let's try to get back to some of that testimony that we just went over. So you spoke about hearing everything in or around the beginning of November 2018. Do you remember that? And by "everything," I mean the allegations that are the subject matter in this case. A. Yes. Q. And can you pin down exactly what the date is when you first heard the allegations of Lisa Barbounis?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	And Lisa Barbounis? A. Yes. Q. Did you interview Matthew Bennett? A. Yes. Q. And did you interview Caitriona Brady? A. Yes. Q. Delaney Yonchek? A. Yes. Q. Did you interview Thelma Prosser? A. Yes. Q. And did you -- can you think of anyone else that you interviewed? A. Gregg, Stacey [phonetic]. Q. Anybody else? A. Gary, maybe. I'm not sure. Gary Gambill. Q. Gary? A. Gambill. Q. Gambill. A. Maybe. Q. So that's ten people. Other than those ten people, is there anyone else that you can think of that you interviewed? It's okay -- if you leave someone out, it's not the end of the world. A. No.	Page 104

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1	<p>Q. The interview with -- who did you interview first; do you remember?</p> <p>A. No.</p> <p>Q. Do you remember -- these interviews, did they take place over the phone, in person?</p> <p>A. In person, one-on-one in their offices.</p> <p>Q. You visited each of their offices?</p> <p>A. I did.</p> <p>Q. And tell me, please, what Lisa Barbounis reported.</p> <p>MR. CAVALIER: Object to form. You can answer.</p> <p>BY MR. CARSON:</p> <p>Q. What did she say?</p> <p>A. She gave me a exposition of her complaints about Gregg as a manager, as her supervisor.</p> <p>Q. And what precisely did she say about Gregg as a supervisor?</p> <p>A. Too demanding, too inquisitive, watching everybody, manipulative.</p> <p>Q. I didn't hear the last one.</p> <p>A. Manipulative.</p> <p>Q. Anything else?</p> <p>A. I can't remember exactly if it was she,</p>	<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p>Q. Did she describe any other sexually inappropriate conduct?</p> <p>A. No.</p> <p>MR. CAVALIER: I'm gonna object to form on the last question.</p> <p>BY MR. CARSON:</p> <p>Q. Did she say that Gregg Roman brushed against her in the office?</p> <p>A. No.</p> <p>Q. Did she say that Gregg Roman showed her inappropriate photos?</p> <p>A. No.</p> <p>Q. Did she say whether Gregg Roman forced her to sit inappropriately close to him, other than the couch incident?</p> <p>A. She did complain that he wanted her by his side. I don't know if it was inappropriate, but she was being called into his office -- the witness is doing something to be there -- and she thought it was a waste of time. She didn't like it. She thought he was wasting her time.</p> <p>Q. Regarding the other complaints regarding Gregg Roman being manipulative or -- did you ever hear complaints about Gregg Roman like that before?</p>	<p style="text-align: center;">---</p>	<p style="text-align: center;">---</p>
1	<p>but make-work that wasn't serious. Range of issues.</p> <p>Q. Did she talk about any inappropriate conduct in terms of, you know, sexual harassment?</p> <p>A. Yes.</p> <p>Q. What did she say about that?</p> <p>A. She told me about the trip to Israel, and she showed me her screenshots of her text to her husband, and I don't know who else, and she [inaudible].</p> <p>THE COURT REPORTER: I didn't hear that last part.</p> <p>THE WITNESS: She told me what happened there.</p> <p>BY MR. CARSON:</p> <p>Q. What did she say happened?</p> <p>A. She said that they had a Airbnb together and that, late one evening, he had stretched out on the couch and said something to the effect of, now we are close, and now I can put my feet on your -- against your body.</p> <p>Q. Did she say where on her body that he put -- where he put his feet?</p> <p>A. On her back and on her -- on her bottom and back.</p>	<p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p style="text-align: center;">---</p>	<p style="text-align: center;">---</p>

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	<p style="text-align: center;">---</p> <p>1 A. She had no complaints about anybody, about 2 Gregg, while she was an active employee. 3 Q. Did you consider that -- did you consider 4 Tiffany Lee's charge of discrimination in any way 5 when you heard about these allegations from Patricia 6 McNulty and Lisa Barbounis and Marnie Meyer? 7 A. No. I thought about the Derek Smith Law 8 Firm -- Law Group -- 9 Q. Why is that? 10 A. -- to those two cases and a third case 11 also concocted complaints against us. I don't know 12 what it is about Derek Smith Law Group, why you have 13 it in for the Middle East Forum, but anybody who's 14 unhappy about anything or has any aspirations to 15 anything turns to the Derek Smith Law Group -- 16 Caroline Miller, Ken Lobitz [phonetic], Seth Carson, 17 Erica Shikunov. Everybody wants to get at us with 18 the Derek Smith Law Firm. You tell me why. 19 Q. If -- well, I didn't work here when 20 Tiffany Lee filed a charge, so I don't have any 21 knowledge related to that, but I guess my question 22 is, other than Tiffany Lee and the plaintiffs in 23 this case, is there another allegation or charge 24 that was filed against the Middle East Forum?</p>	<p style="text-align: center;">so [inaudible].</p> <p>1 Q. Why -- what was Lara's position? 2 A. Lara was assistant to Gregg. 3 Q. An assistant to who? 4 A. Gregg. 5 Q. And what's Lara's last name? 6 A. I don't remember. 7 Q. What about Laura? Laura's last name is 8 Frank? 9 A. Could be, yeah. 10 Q. Laura Frank, what was her job? 11 A. Director of development, I believe. 12 Q. Did Lara and Laura talk to each other 13 during work using any electronic messaging apps that 14 you know of? 15 MR. CAVALIER: Object to form. 16 THE COURT REPORTER: I didn't get the 17 answer. 18 THE WITNESS: That's all they did is 19 message each other on Slack, which we have. 20 Endless, endless discussions hating Gregg, 21 hating me. Nasty, snarky, endless, endless, 22 endless. 23 BY MR. CARSON: 24</p>	<p style="text-align: center;">---</p>
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	<p style="text-align: center;">---</p> <p>1 A. Not filed, but I believe a letter was sent 2 from Smith Law Group about Lara [phonetic] and 3 Laura, who were also terminated because they were 4 poor employees. When they started talking about the 5 case against us, we showed them what we knew about 6 them, and they dropped it. But that's four 7 different instances of turning to lawyers who 8 presently or had been at the Derek Smith Law Group. 9 Q. What were the -- what were the complaints 10 that Lara and Laura made? 11 A. You're interrupting me. I guess the Derek 12 Smith Law Group doesn't like what we do. 13 Q. I don't think anyone here knows what you 14 guys do, but what were the complaints that Lara and 15 Laura made? 16 A. I don't remember. They were minor, and I 17 don't know if I ever saw them. They're not on my 18 hard drive. I don't know what they were. 19 Q. Was it related to sexual harassment? 20 A. I don't know. 21 Q. Just the allegations. I'm not saying -- 22 I'm not giving any credence to them. 23 A. I don't know. Just remember they started 24 making noises, and then they wanted money from us,</p>	<p style="text-align: center;">---</p> <p>1 Q. And you still have those messages, right? 2 A. I'm not sure. 3 Q. Well, you just said "which we have". 4 A. Which we -- which I read at the time. 5 Presumably, it's somewhere. 6 MR. CARSON: I'm gonna ask that you guys 7 turn those messages over in response to our 8 discovery requests. 9 MR. CAVALIER: If we have them in our 10 possession, custody, or control and there's a 11 responsive request, we will do so. 12 MR. CARSON: I mean, we definitely 13 requested them in our request for production of 14 documents. So there's Slack messages which -- 15 just testifying to having. 16 THE WITNESS: No. I testified that I read 17 them at the time. 18 BY MR. CARSON: 19 Q. A minute ago, you said "which we have," 20 so -- 21 A. I'm correcting it and saying I read it at 22 the time, which is middle of 2017 -- 23 Q. Right. 24 A. -- years ago. I don't know if I have them</p>	<p style="text-align: center;">---</p>

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1	<p style="text-align: center;">---</p> <p>now. [Inaudible] --</p> <p>MR. CAVALIER: If we have responsive documents that are responsive and not privileged to the request you issued we will produce them.</p> <p>MR. CARSON: We'll deal with that.</p> <p>BY MR. CARSON:</p> <p>Q. So what did these messages say about Gregg Roman?</p> <p>A. Just they were nasty.</p> <p>Q. They were nasty?</p> <p>A. Nasty.</p> <p>Q. Why were they nasty?</p> <p>A. Have to ask them.</p> <p>Q. Why did you think they were nasty?</p> <p>A. I have no idea. I didn't know them. I found their vituperation against him and myself and maybe others to be surprising, but there it was.</p> <p>Q. How many people other than the -- other than Tiffany Lee and Lara and Laura and Delaney and Caitriona and Marnie and Patricia McNulty and Lisa Barbounis have complained about Gregg Roman?</p> <p>A. Nobody.</p> <p>Q. No one else?</p>	1	<p style="text-align: center;">---</p> <p>A. -- heard from me on this, both in person. At the time, I remember, he was sitting in my office, and he said, "Matt, get over here," and I said, "You can't treat him like that." Other times, there are two written documents -- I mean, there are other times I said it in person, but the two documents, we have emails from me to Gregg lacerating him, being too tough, too bossy. I called him a drill sergeant. You don't behave like this. You get the best out of people by working with them and not bossing them [inaudible]. I was the one who complained. Matt never said a word [inaudible] --</p> <p>THE COURT REPORTER: It's really hard to hear you, Mr. Pipes. Please speak up.</p> <p>THE WITNESS: -- anyone else. I, on my own, complained that he was too bossy. I complained to him. He heard it through me.</p> <p>BY MR. CARSON:</p> <p>Q. So Matt didn't complain; Gregg -- you complained?</p> <p>A. I complained, and I complained number of times, and I kept on complaining. He's a brilliant administrator. He knows the subject, but he was too</p>
1	<p style="text-align: center;">---</p> <p>A. Not to me. Not to my knowledge.</p> <p>Q. No one else complained that Gregg Roman disparages other employees?</p> <p>A. I am president. I am not omniscient voyeur of what everyone is doing and saying.</p> <p>Q. Well --</p> <p>A. -- not to me.</p> <p>Q. I'm not suggesting that omniscience is required. I'm asking if you ever heard any other employee of the Middle East Forum make complaints about the way Gregg Roman behaved in his -- in his role as director of the Middle East Forum.</p> <p>A. Yes. And two years ago Matt complained as well, Matt Bennett.</p> <p>Q. Matt Bennett made complaints, too?</p> <p>A. Yeah.</p> <p>Q. What were Matt Bennett's complaints?</p> <p>A. Again, Gregg was too tough. He was bossing them around. And I might add that the only bossiness I saw on Gregg's part was vis-à-vis Matt, not the plaintiffs.</p> <p>Q. Did anyone else besides Matt Bennett --</p> <p>A. Don't interrupt me. And he --</p> <p>Q. Okay.</p>	1	<p style="text-align: center;">---</p> <p>tough, too bossy. I didn't like it, didn't think it's the way one should treat one's colleagues. So that was my complaint. My complaint. Nobody came to me. I, on my own, from what I witnessed, particularly vis-à-vis Matt, was displeased with his bossiness. So I understood when they said he's too bossy. I said, yeah, I understand. I saw -- I didn't see it with the others, but I saw it with Matt.</p> <p>Q. You ever seen Gregg take his penis out in front of a female employee?</p> <p>MR. CAVALIER: Object to form.</p> <p>BY MR. CARSON:</p> <p>Q. Yes or no?</p> <p>A. No.</p> <p>Q. You ever seen Gregg rub his body against a female employee?</p> <p>A. No. I never saw any kind of harassment of any sort.</p> <p>Q. Did Gregg ever -- strike that. Did you ever -- did you know that one of the complaints that the women were making is that they weren't allowed to come to you directly, that Gregg had a policy whereby people weren't allowed to talk to you or</p>

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1	report things to you? Did you know that?	1	have any problems.
2	A. I know it's in the complaint, to which my	2	BY MR. CARSON:
3	response is, I told every new employee two things:	3	Q. Are you listed in that -- in that employee
4	The number one rule is no surprises. If something's	4	manual for -- as part of the reporting process?
5	going wrong, come to me early, not when it's a	5	A. As the president, not by name, yes. There
6	full-bloomed crisis. Number two, my door is open,	6	was also a process by which employees unhappy about
7	both literally and figuratively. Come to me if you	7	something would turn to the director of human
8	have any problems. So it is very hard for me to	8	resources, being Marnie Meyer, and I believe, in
9	believe that they were concerned about coming to me	9	some cases, people did do that, but I don't know
10	with their problems since I had specifically invited	10	details, but they did do that.
11	them to come to me with their problems.	11	Q. Other than Matt Bennett, Lisa Barbounis,
12	Q. But they told you that, too, right, that	12	Caitriona Brady, Delaney Yonchek, Laura Frank,
13	they -- that Gregg maintained this policy which	13	Lara -- we'll say Lara, last name unknown, since I
14	blocked them from coming to you or which was -- they	14	don't know it off the top of my head -- Patricia
15	believed blocked them from coming to you?	15	McNulty, did anyone else -- did any other employees
16	A. They did tell me that, yes.	16	complain to you about the way Gregg Roman behaved?
17	Q. Does the Middle East Forum maintain a	17	A. No. I -- in November 2018, there was this
18	policy to prevent discrimination and harassment in	18	crisis in the office, and I then approached the
19	the workplace?	19	out-of-office staff and asked them if they had
20	A. Yes, and we've held workshops for	20	problems with Gregg. I think I approached all the
21	refreshers on those subjects.	21	project directors at the time, and all said things
22	Q. When's the last time you've held one of	22	were fine. One said few things I don't like, but
23	these workshops?	23	nothing particularly deep. So they gave him a clean
24	A. I think it was in 2018.	24	bill of health, so he was an office issue, not a
	Page 118		Page 120
1	Q. In 2018?	1	Forum-wide issue. Outside the office did not
2	A. Yes.	2	have --
3	Q. Was that in response to the reports that	3	Q. They all gave him a clean bill of health?
4	are the subject matter of this case?	4	A. Yeah. Well, except for one who had a few
5	A. No. It was ahead of it, sometime in the	5	issues, yes.
6	early part of the year.	6	Q. What was the one's complaints?
7	Q. The policy that Middle East Forum	7	A. Something on the lines of piling on too
8	maintains to prevent discrimination and harassment	8	much -- two different projects. Before one ended,
9	in the workplace, is that a written policy?	9	the next one started.
10	A. Yes. It's in the personnel manual.	10	Q. I'm sorry. I didn't hear you.
11	Q. It's in the personnel manual?	11	A. Something on the lines of, before one
12	A. Yes.	12	project was finished, the next one was started.
13	Q. Where does it say that employees should	13	Q. Other than that one complaint, was there
14	complain about discrimination and harassment or	14	any other complaints?
15	report discrimination and harassment?	15	A. No.
16	A. [Inaudible].	16	Q. The project directors -- strike that.
17	THE COURT REPORTER: I cannot hear you,	17	Just a moment, please. I'm just finding a document.
18	Mr. Pipes.	18	Just a minute, please, while I pull this up. Sorry.
19	THE WITNESS: I don't have the personal	19	Just an indulgence for a second. Okay. All right.
20	[inaudible] cite to you paragraph, but I know	20	So do you see this document right here, which is --
21	that it's part of my policy, it's fairly	21	wait. I gotta keep a list of exhibits. So Exhibit
22	extensive in there, and I also know that I told	22	No. 1 was -- Exhibit 1 we'll call Pipes-1, I guess,
23	every employee as the employee started there	23	and Pipes-1 was the --
24	would be no surprises, and come to me if you	24	THE VIDEOGRAPHER: It was the Middle

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1	East -- --- (Indistinguishable cross-talk.) ---	1	A. It does, yeah. 2 Q. -- project director said about Gregg? 3 A. Yep. 4 Q. They did not give him a clean bill of 5 health, correct? 6 A. Well, I mean, they all had something to 7 say, but I asked the project directors about their 8 willingness to work with you. Five out of the six 9 were happy to do so. So that's what I mean by clean 10 bill of health. Were they happy about everything? 11 No, but they were happy to work with him, and that's 12 a clean bill of health. One had his doubts. 13 Q. One had his doubts? 14 A. Wasn't so happy about working with him, 15 but -- 16 Q. Who was the one who didn't wanna work with 17 him? 18 A. I don't remember. 19 Q. Well, who are the project directors? What 20 are their names? 21 MR. CAVALIER: Object to form. 22 THE WITNESS: Back then, I'm not sure. I 23 have to check. 24 BY MR. CARSON:
1	MR. CARSON: Sure. THE VIDEOGRAPHER: -- do it like that. MR. CARSON: All right. Thank you. So Pipes-2 is MEF Docs 975 to 978. THE VIDEOGRAPHER: Gotcha. BY MR. CARSON: Q. So, Mr. Pipes, this is an email that, it looks like, was sent by you to Gregg Roman on November 8, 2018 at 9:02 a.m. Do you see that right here? A. Mm-hmm. Q. Okay. A. Yes. Q. So just take a minute and you can read it, and I'll ask you questions about it when you're done. A. Okay. Okay. Okay. Q. Sorry. You guys are on my screen. I was gonna check my email. A. Okay. Q. So... A. Okay. Okay. Okay. Read it. Q. Does that give you a better recollection of what the --	1	Page 122 --- Q. That's what we're talking about here. 2 These are the project directors, correct? 3 A. Right, but this is over two years ago, and 4 I have to go check who was doing what when. And -- 5 Q. Go ahead. You wanna add something? 6 A. No. 7 Q. So, just pointing out a couple things, you 8 say here that four of them made critical comments, 9 right? 10 A. Yep. 11 Q. And you sent this email to Gregg to make 12 him aware of these comments; is that right? 13 A. And to select in-office staff, yes. 14 Q. So why didn't you -- it says, "I listed 15 the harsh criticisms of you from in-office staff but 16 have not collected these in a systematic way." Why 17 didn't you collect them in a systematic way? 18 A. Finish the sentence. 19 Q. I see what it says. Says, "Because you 20 will not be working with them going forward," but 21 why does that matter? 22 A. He knew what they had to say. I didn't 23 have to memorialize it because they weren't gonna be 24 working together.

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	<p style="text-align: center;">---</p> <p>1 Q. So nowhere are your conversations with 2 the -- you know, ten people that we listed earlier 3 that you spoke to in the beginning of November 2018, 4 nowhere are those conversations memorialized the way 5 these conversations are, right?</p> <p>6 MR. CAVALIER: Object to form, foundation. 7 You can answer.</p> <p>8 THE WITNESS: I took notes, but because 9 everything was solved to apparently everyone's 10 satisfaction, I did not -- I'm not sure if I 11 still have those notes. It didn't seem 12 important. We had --</p> <p>13 BY MR. CARSON:</p> <p>14 Q. What did you do --</p> <p>15 A. We dealt with the issue, and maybe I have 16 them somewhere; maybe I don't. I don't know.</p> <p>17 Q. I asked on the record that the notes from 18 those meetings -- search your records, and if you 19 have them, that you turn those over in response to 20 our first set of -- first request for production of 21 documents. Meetings. How did you keep those notes, 22 you handwrote them during the meetings?</p> <p>23 A. Handwrote them during the meetings, yeah. 24 Q. Again, please check your records and turn</p>	<p style="text-align: center;">---</p> <p>1 Q. Well, don't you think it's important to 2 document it, like to keep a record of who's saying 3 what? I understand why you might not have wanted 4 Gregg to read it, but why wouldn't you keep records 5 like that?</p> <p>6 A. Because go to the top, and you'll see that 7 I gave them assurance of confidentiality.</p> <p>8 Q. Sorry?</p> <p>9 A. This information was sent to me on 10 assurances of confidentiality.</p> <p>11 Q. You thought -- you would -- what about 12 with yourself? Wouldn't you want those records for 13 yourself?</p> <p>14 A. I offered confidentiality. I maintain 15 that confidentiality in this note, which went not 16 only to Gregg, but also to select in-office staff. 17 So it went to several people, and I thought it best 18 not to provide specific names, and there is no name 19 in here other than Gregg's.</p> <p>20 Q. So this person is saying something more 21 calculated and toxic --</p> <p>22 A. Yes.</p> <p>23 Q. -- first blank -- sorry. Did you --</p> <p>24 A. Well, this is the accusation that he was</p>	
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	<p style="text-align: center;">---</p> <p>1 them over if you can find them. So one person said 2 that he -- "I have often had to listen -- both on 3 the phone and in person -- as Gregg expressed 4 unpleasant views toward other members of staff. He 5 often denounces or spoken ill of other project 6 directors or office staff before pointedly asking me 7 what I thought of them. I could only speak in their 8 defense or offer a noncommittal response. This does 9 not seem to have been ordinary office politics, but 10 something more calculated and toxic. First XX, and 11 then XX" -- what's the XX there and the XX? Why 12 does it say XX?</p> <p>13 A. Names of individuals.</p> <p>14 Q. You didn't want Gregg to know who was 15 making the statements; is that right?</p> <p>16 A. No. The whole thing is anonymous.</p> <p>17 Q. Well, whose names were there before you 18 X'd them out?</p> <p>19 A. I have no idea.</p> <p>20 Q. Well, how do we figure that out?</p> <p>21 A. I don't know.</p> <p>22 Q. Well, do you have any notes anywhere that 23 we could look to?</p> <p>24 A. I don't know.</p>	<p style="text-align: center;">---</p> <p>1 manipulative, yes. This is what I heard from 2 in-office and heard it from outside of the office, 3 too, yes.</p> <p>4 Q. Well, he names two people that are the 5 most frequent targets of Gregg, right?</p> <p>6 A. He or she does, yes.</p> <p>7 Q. So don't you think it's important what 8 those names are if they're relevant to this case?</p> <p>9 MR. CAVALIER: Object to form, foundation.</p> <p>10 THE WITNESS: I assured them of 11 confidentiality.</p> <p>12 BY MR. CARSON:</p> <p>13 Q. But your word that you'll keep it 14 confidential isn't a reason not to disclose that in 15 this case. You understand that, right?</p> <p>16 A. I don't know. This is two years ago. I 17 have no idea who these people are.</p> <p>18 Q. You just forgot?</p> <p>19 A. Yes. I mean, I move on. I deal with the 20 Middle East. I don't spend my time thinking about 21 office -- the office.</p> <p>22 Q. You don't --</p> <p>23 A. I dealt with it -- let me finish -- I 24 dealt with it. I dealt with it satisfactorily.</p>	

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	<p style="text-align: center;">---</p> <p>1 Everyone in the office literally signed on who was  2 concerned. All three of the complainants signed on,  3 like written documents saying they're fine with it.  4 They weren't happy about every aspect, but they were  5 fine with it. Gregg was fine with it. We moved on.  6 I did not think about these things after that. I  7 have not thought about them for two years. We  8 solved the problem. I --</p> <p>9 Q. Did any of them complain after they gave  10 you that agreement?</p> <p>11 A. I told you not a single complaint before  12 November 1st or after November 6th, 7th, or so. Not  13 a single one.</p> <p>14 Q. You're sure of that?</p> <p>15 A. Well, I don't remember any. I can't tell  16 you for sure. I might've forgotten something, but I  17 don't remember any complaints, certainly nothing of  18 a sexual nature, nothing that would cause me to fire  19 Gregg, which I said I would do if there was anything  20 of a sexual nature.</p> <p>21 Q. What about retaliation? Would you fire  22 Gregg if he retaliated against the employees who  23 reported him?</p> <p>24 MR. CAVALIER: Object to form.</p>	<p style="text-align: center;">---</p> <p>1 he has no second chance.</p> <p>2 BY MR. CARSON:</p> <p>3 Q. But they did let you know, and you didn't  4 do anything about it, right?</p> <p>5 MR. CAVALIER: Object to form, foundation.</p> <p>6 THE WITNESS: They did not let me know.</p> <p>7 They let me know in early November about things  8 that had happened months and months earlier.</p> <p>9 Prior to November there were no complaints  10 about anything of a sexual nature or anything  11 else, for that matter, that I can recall. I  12 mean, not everybody finds him wonderful in  13 every way, but I do not recall any serious  14 complaints about Gregg before or after that  15 week in the middle of -- at the beginning of  16 November 2018.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. No complaints about retaliation?</p> <p>19 A. No complaints about retaliation.</p> <p>20 Q. No complaints, period, actually?</p> <p>21 A. No complaints, period, yes. That's  22 correct. If there were some and I forgot, then  23 remind me, but I remember nothing. I remember a  24 clean bill, and I remember Tricia, in particular,</p>	
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	<p style="text-align: center;">---</p> <p>1 THE WITNESS: He had no opportunity to  2 retaliate.</p> <p>3 BY MR. CARSON:</p> <p>4 Q. We can't -- did you hear that, because I  5 didn't.</p> <p>6 A. There was no opportunity for him to  7 retaliate. He was out of their lives. Between  8 November and March, he had almost no contact with  9 them. Only after March did he do so.</p> <p>10 Q. Well, he was still the director of the  11 Middle East Forum that whole time, right?</p> <p>12 A. He had the same title but very different  13 job responsibilities. I'm sure you have the email I  14 sent to him describing his new responsibilities, and  15 you'll see that he had no -- essentially,  16 effectively, no contact, just some emails once in a  17 while. I took him out of their lives, and they were  18 content.</p> <p>19 Q. They were content unless they were  20 complaining about it the whole time to you, right?</p> <p>21 MR. CAVALIER: Objection.</p> <p>22 THE WITNESS: I specifically said at the  23 meeting and in other context if you have any  24 problems with Gregg, let me know. I told them</p>	<p style="text-align: center;">---</p> <p>1 saying at the March meeting he's been great. I have  2 no complaints. She said it explicitly. I have no  3 complaints.</p> <p>4 Q. Tricia definitely didn't make any  5 complaints to you?</p> <p>6 A. Definitely.</p> <p>7 Q. In fact, she said the opposite. She said  8 everything's great?</p> <p>9 A. She said I have no problems with Gregg  10 since November, the last five months.</p> <p>11 Q. And if she was complaining to you, you  12 would've fired Gregg?</p> <p>13 A. If I had a complaint, particularly of a  14 sexual -- not any complaint would get him fired --  15 but a complaint of a sexual nature, then, yes, I  16 would've fired him immediately.</p> <p>17 Q. Well, what happened with Alana Goodman,  18 that's of a sexual nature, right?</p> <p>19 MR. CAVALIER: Object to form, foundation.</p> <p>20 THE WITNESS: If it happened. I don't  21 know when it happened. I was not aware of it.  22 There was not a complaint, so it was not part  23 of my decision making.</p> <p>24 BY MR. CARSON:</p>	

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	<p style="text-align: center;">---</p> <p>1 Q. Well, now you're aware of it today. Are 2 you gonna fire Gregg?</p> <p>3 A. I am not gonna engage in hypotheticals.</p> <p>4 Q. Well, are you gonna call Alana Goodman 5 after this and talk to her about the recording you 6 heard today?</p> <p>7 A. I am not going to take your bait.</p> <p>8 Q. Are you gonna investigate it?</p> <p>9 A. I am not going to take your bait.</p> <p>10 Q. It's not bait. It's a question, and you 11 have to answer it. Are you gonna investigate the 12 recording you just heard today?</p> <p>13 MR. CAVALIER: Object to form, foundation.</p> <p>14 THE WITNESS: I am not the Middle East 15 Forum den mother. I am not looking into 16 people's private lives, and if I did, I would 17 have no time for the Middle East, which is what 18 I work on.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. You would have what?</p> <p>21 A. No time for the Middle East, which is what I work on.</p> <p>22 Q. You don't have time to investigate this stuff because you're not their den mother; is that</p>	<p style="text-align: center;">---</p> <p>1 A. No idea. You have to ask them.</p> <p>2 Q. Well, they told you that, didn't they?</p> <p>3 A. I have no memory of that.</p> <p>4 Q. Can you understand why it might've been 5 hard for some of them to come to you?</p> <p>6 A. Not at all.</p> <p>7 Q. You don't understand that?</p> <p>8 A. No. I said come to me if you have any 9 problems. Don't hit me with surprises. Let me know 10 when there's a problem brewing. If something had 11 happened in Israel in early 2018, it was incumbent 12 upon Lisa to come to me and tell me about it, and 13 she didn't do so.</p> <p>14 Q. Would you characterize yourself as having 15 a welcoming personality?</p> <p>16 A. I am not going to take your bait, 17 Mr. Carson.</p> <p>18 Q. I'm just -- I mean, the allegations in 19 this case are very personal to these women, right?</p> <p>20 A. Yes, and they came to me November. They 21 could've come to me in -- in a timely manner. They 22 didn't, in particular the AIPAC and the Israel 23 events. I don't remember when the Marnie 24 conversation was, how much earlier, but these were</p>	Page 135
	<p style="text-align: center;">Page 134</p> <p>1 right?</p> <p>2 MR. CAVALIER: Object to form. Object to 3 characterization.</p> <p>4 MR. CARSON: I'm repeating your client's 5 testimony, Jon. I understand why you wanna 6 object, though. Trust me.</p> <p>7 THE WITNESS: I am a Middle East 8 specialist. I am the head of an organization. 9 I deal with the organization. As you can see, 10 in early November I had a problem, I dealt with 11 it expeditiously, I investigated it, and I 12 mediated it, and everyone was content with it, 13 and I moved on, and they moved on. At least, 14 it appeared. I called them. To their faces, I 15 said you are my heroes and my angels. We're 16 gonna work together. We're gonna fix this. 17 And they said yes, and then you pop up and 18 cause a problem.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. What was the last thing you said?</p> <p>21 A. And then you pop up five months later, and 22 everything falls apart.</p> <p>23 Q. All right. So you understood that these 24 women looked up to you, right, personally?</p>	<p style="text-align: center;">---</p> <p>1 in the spring, and they came to me in the fall, some 2 six, seven, eight months later. That was wrong on 3 their part. And, as indicated earlier, the initial 4 information I had was Marnie's report, and Lisa 5 said, no, Gregg had not hit on her. So what am I to 6 think? Eight months, and the first report is that 7 she said no.</p> <p>8 Q. Well, you did --</p> <p>9 A. -- seriously. I took it seriously, and I 10 took radical steps. I investigated, mediated, got 11 everyone into agreement, and removed Gregg from his 12 office role, retained his external role with the 13 projects, with fundraising, with dealing with the 14 media and the like. So I dealt with it fully and 15 satisfactorily to everyone's -- to everyone's 16 satisfaction. So why, in June 2019, we get hit with 17 five EEOC and then lawsuits is a little strange 18 since everyone said it was fine, and the two who 19 were not part of this didn't say a word, not a word.</p> <p>20 Q. Well, Caitriona Brady did, right?</p> <p>21 A. No, not a word.</p> <p>22 Q. You don't think she was upset if Gregg -- 23 you don't think she was upset if Gregg Roman was 24 telling people that Marnie got her job by giving --</p>	Page 136

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	<p style="text-align: center;">---</p> <p>1 by trading sexual favors with her father?</p> <p>2 MR. CAVALIER: Object to form, foundation.</p> <p>3 THE WITNESS: In the first place, I'm not</p> <p>4 gonna attempt to ascertain how she felt. It's</p> <p>5 not my business. But, secondly, there was this</p> <p>6 rumor that Marnie ascribed to Gregg. Marnie</p> <p>7 has been proven to be a liar since then. I</p> <p>8 have no reason to believe what Marnie has said</p> <p>9 to them about that. Let me put it</p> <p>10 differently --</p> <p>11 MR. CARSON: Can you hear, because I'm</p> <p>12 having a really hard time.</p> <p>13 THE COURT REPORTER: It's very tough.</p> <p>14 THE WITNESS: Okay. First, I have no way</p> <p>15 of explaining to you what Brady's mental state</p> <p>16 was. I have no idea, and I'm not gonna answer</p> <p>17 that. Secondly, that rumor, we have never</p> <p>18 found out where it came from. Marnie ascribed</p> <p>19 it to Gregg. I have no reason to believe that</p> <p>20 that is the case. I don't know where it came</p> <p>21 from, but I have no reason to believe that</p> <p>22 Gregg was the source of it. So --</p> <p>23 BY MR. CARSON:</p> <p>24 Q. Why, because -- go ahead. You can finish.</p>	<p style="text-align: center;">---</p> <p>1 Q. And Gregg denied it?</p> <p>2 A. Gregg denied it.</p> <p>3 Q. Was there any other reason besides Gregg's</p> <p>4 denial that you didn't believe it came from Gregg?</p> <p>5 A. I don't know where it came from. It may</p> <p>6 have come from Gregg; it may have come from Marnie;</p> <p>7 it may have come from Brady; it may have come from</p> <p>8 Lisa. I have no idea.</p> <p>9 Q. You think Marnie started the rumor about</p> <p>10 herself?</p> <p>11 A. [Inaudible].</p> <p>12 THE COURT REPORTER: What was that, sir?</p> <p>13 THE WITNESS: They were playing so many</p> <p>14 games. I don't know what they were --</p> <p>15 BY MR. CARSON:</p> <p>16 Q. Who was playing games?</p> <p>17 A. All of these people.</p> <p>18 Q. Who are you talking about when you say</p> <p>19 that?</p> <p>20 A. Marnie, Lisa, Tricia, Matt. Playing</p> <p>21 games. The very first --</p> <p>22 Q. Marnie, Tricia, Lisa, Matt. Who else?</p> <p>23 A. Those four. The very first memo, the</p> <p>24 handwritten memo, was all about the games. Matt's</p>	Page 139
	<p style="text-align: center;">Page 138</p> <p>1 A. Finished.</p> <p>2 Q. Why, because Gregg denied it? That's why</p> <p>3 you don't think it came from him?</p> <p>4 A. Because there's a tissue of lies about</p> <p>5 this.</p> <p>6 Q. Where'd that --</p> <p>7 A. Tissue of lies.</p> <p>8 Q. Where'd that tissue of lies begin?</p> <p>9 A. Where'd it begin? I don't know where it</p> <p>10 began. There's just so many of them.</p> <p>11 Q. Well, when is the first time you heard</p> <p>12 about this rumor? And by "rumor," I think we're</p> <p>13 both talking about the same thing. There was a</p> <p>14 rumor that Gregg Roman said that Caitriona Brady's</p> <p>15 father had traded sexual favors with Marnie.</p> <p>16 A. No. The rumor was that Marnie's -- that</p> <p>17 Marnie had sexual relations with Brady's father in</p> <p>18 order to get a job.</p> <p>19 Q. Okay.</p> <p>20 A. Wasn't Gregg's rumor. It was a rumor.</p> <p>21 Q. Let's just characterize it as a rumor for</p> <p>22 now. So you did hear that Gregg started the rumor,</p> <p>23 correct?</p> <p>24 A. Marnie told me that. Yes.</p>	<p style="text-align: center;">Page 140</p> <p>1 doing this to push Lisa to take a job she can't</p> <p>2 handle so that Tricia can take over her job. I</p> <p>3 mean, I had no idea this was taking place, and then</p> <p>4 after -- after that, it kept on going. Matt wanted</p> <p>5 the directorship. Marnie wanted the directorship.</p> <p>6 Lisa wanted directorship. Everybody was after</p> <p>7 Gregg's position, playing games. I don't know</p> <p>8 what -- I don't know what the specific tactics were,</p> <p>9 but I know that they were playing games.</p> <p>10 Q. Earlier you said you didn't know what</p> <p>11 Brady's mental state was, right?</p> <p>12 A. Yes.</p> <p>13 Q. That's Caitriona Brady?</p> <p>14 A. Correct.</p> <p>15 Q. Why are you questioning her mental state?</p> <p>16 MR. CAVALIER: Object to form. Object to</p> <p>17 the characterization.</p> <p>18 BY MR. CARSON:</p> <p>19 Q. Why are you questioning her mental state?</p> <p>20 A. You asked me if she did not feel this or</p> <p>21 that, and I said I have no idea what she felt. I</p> <p>22 did not talk to her about it, and I'm not gonna</p> <p>23 guess at what she was feeling.</p> <p>24 Q. You didn't talk to her about it?</p>	Page 140

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1	A. I talked to her not at all about this.	1	Q. Okay. So --
2	Q. Don't you think that you owed it to her to	2	A. Or, I should say, in the case of the staff
3	talk to her about it?	3	who are not in the office, I wrote to them.
4	MR. CAVALIER: Object to form, foundation.	4	Q. Fair enough.
5	THE WITNESS: If she had wanted to talk to	5	A. Personal communication between me and
6	me, she could've come to me. [Inaudible] that	6	them, one-to-one, which I then shared with Marc, and
7	I was looking to see if he had done anything	7	we worked out resolutions and solutions.
8	wrong after November and that I was eager to	8	Q. As far as the -- as far as the -- the
9	learn of any -- anything wrong he did,	9	rumor about Caitriona Brady's father and Marnie
10	particularly in the sexual area. Nobody came	10	Meyer, that wasn't done that week, correct? That
11	to me.	11	was done at a later date?
12	BY MR. CARSON:	12	A. That was well into 2019. Yes.
13	Q. How long did your investigation take?	13	Q. And did you investigate that in any way?
14	A. Investigation of what?	14	A. I tried, but I hit a brick wall.
15	Q. You testified earlier that, as part of the	15	Everything was contradictory. At a certain point, I
16	investigation, you interviewed everyone in the	16	just couldn't figure out who was saying what to
17	office. How long did that investigation take?	17	whom.
18	A. It dominated a week of mine from the 1st	18	Q. Wasn't it true that everyone was telling
19	of November till the 7th or 8th or so. This letter	19	you Gregg Roman said it except Gregg Roman?
20	that you have up here is dated, I think, the 8th, so	20	A. No.
21	that's a full week from the 1st. Something on the	21	Q. What did Lisa tell you about it? Did you
22	order of [inaudible].	22	interview Lisa?
23	Q. Sorry. I didn't hear the last thing you	23	A. I did, and I can't tell you specifically
24	said.	24	who said what, but I remember that some thought it
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1	A. Something on the order of a week. Nothing	1	---
2	else. Talked to Marc incessantly, talked to others	1	was Marnie who had come up with it; some thought
3	at great length, asked lots of questions, discussed	2	Lisa who had come up with it; and some thought Gregg
4	with Marc what steps to take. Marc was my legal	3	had come up with it.
5	and -- my legal confidant who worked with me on	4	Q. Who thought Lisa came up with it?
6	fixing this.	5	A. I can't remember the specifics.
7	Q. Who was your legal confidant? Oh, Marc	6	Q. Just Gregg Roman, right?
8	Fink, your house counsel, correct?	7	MR. CAVALIER: Object to form.
9	A. Yes.	8	THE WITNESS: I -- I don't know.
10	Q. Yeah. You don't have to tell me what he	9	BY MR. CARSON:
11	said. Let me think. So when you say that it took a	10	Q. Did you send Lisa any emails about it
12	week, was that to do all the interviews or what --	11	letting her know that we interview -- you conducted
13	why did it take a week? What did you do throughout	12	this investigation?
14	that week?	13	A. [Inaudible].
15	A. Interviewed, I discussed with Marc, I came	14	THE COURT REPORTER: I can't rem -- I
16	up with different ideas. Essentially, it was a week	15	can't hear you, sir.
17	intensely talking to Marc, gathering information,	16	THE WITNESS: I don't think so. Don't
18	and figuring out solutions.	17	remember if she should, but I don't think so.
19	Q. Did you look at any phone records during	18	MR. CARSON: I really need to take a
20	the course of the investigation?	19	bathroom break. I'm sorry. I can't -- just go
21	A. I did not. I talked to people.	20	off the record for a minute, guys. I'm sorry
22	Q. Did you read emails or Slacks or Telegrams	21	about that.
23	or WhatsApps or anything like that?	22	THE VIDEOGRAPHER: All right. The time
24	A. Nothing. I only talked to people.	23	is --
		24	MR. CARSON: I'll do as long as you want

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1	---	1	---
2	Jon, but I only need like three minutes. I just gotta run to the bathroom.	2	don't fire him?
3	MR. CAVALIER: If we're gonna break --	3	MR. CAVALIER: Object to form.
4	like I always say, if we're gonna break, I'd	4	THE WITNESS: No.
5	rather break for at least ten just so it can	5	BY MR. CARSON:
6	actually be a break.	6	Q. I mean, a lot of women have complained about Gregg Roman's misconduct now, right?
7	MR. CARSON: Yeah, that's fine. All	7	A. Thanks to the Derek Smith Law Group, yes.
8	right. So we'll come back in like 1:21 or	8	Q. Well, are we responsible for Samantha Mandeles complaining about him?
9	something like that.	9	A. Don't know about that.
10	MR. CAVALIER: That works.	10	Q. I'm sorry?
11	THE VIDEOGRAPHER: The time is 1:11, and	11	A. I don't know about that.
12	we are off the record.	12	Q. Are we responsible for Lea Merville [phonetic] complaining about him?
13	---	13	MR. CAVALIER: Object to form.
14	(Whereupon there was a recess in the proceeding from 1:11 p.m. to 1:24 p.m.)	14	THE WITNESS: Don't know about that.
15	---	15	BY MR. CARSON:
16	THE VIDEOGRAPHER: It is 1:24 a.m. --	16	Q. You don't what?
17	excuse me -- p.m. Eastern Time, and we are now	17	A. I don't know about that.
18	on the record.	18	Q. Did you ever talk to Lea Merville?
19	BY MR. CARSON:	19	A. No.
20	Q. Mr. Pipes, did Gregg Roman ever tell you	20	Q. You never called her in your entire life?
21	that he could destroy you?	21	A. I think I met her when she began as an
22	A. No.	22	intern.
23	Q. Did he ever tell anyone else that?	23	
24		24	
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1	---	1	---
2	MR. CAVALIER: Object to form.	2	Q. Well, when you interviewed her during your
3	THE WITNESS: Ask him.	3	investigation into the reports of sexual misconduct,
4	THE COURT REPORTER: Sorry, Seth. What	4	what did she say?
5	was the question?	5	A. I did not --
6	MR. CARSON: Did he ever tell anybody else	6	MR. CAVALIER: Object to form, foundation.
7	that?	7	BY MR. CARSON:
8	MR. CAVALIER: Object to form.	8	Q. Why didn't you interview her?
9	THE WITNESS: Ask him.	9	A. She did not complain. She was not an
10	BY MR. CARSON:	10	employee, and she did not complain.
11	Q. And you said "ask him". Did anyone ever	11	Q. Didn't your director of human resources
12	tell you that he said that?	12	include her in a written complaint that was
13	A. No, not that I remember.	13	submitted to you in November?
14	Q. Do you know why Gregg Roman would think he	14	A. What Seth [sic] does with his personal
15	can destroy you?	15	life is not my concern. My concern was that there
16	MR. CAVALIER: Object to form, foundation.	16	was a large-scale complaint from many staff in the
17	If you can answer it, go for it.	17	office about Gregg.
18	THE WITNESS: No.	18	Q. Did you just say when Seth does?
19	BY MR. CARSON:	19	A. I did not.
20	Q. Are you worried about him being able to	20	Q. Did he say when Seth does?
21	destroy you?	21	A. I did not. I said large-scale.
22	MR. CAVALIER: Same objection.	22	Q. Okay.
23	THE WITNESS: No.	23	A. Large-scale complaint.
24	BY MR. CARSON:	24	Q. I think you meant if Gregg does. I just
	Q. Is that why, no matter what he does, you		wasn't [inaudible]. So, for the record, if you said

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	<p style="text-align: center;">---</p> <p>1 Seth, I think you meant Gregg. What Gregg does --    2 A. I was not talking about you. I was    3 talking about Gregg.    4 Q. So don't you find it disturbing, though,    5 the allegation that was made in connection with Lea    6 Merville?    7 MR. CAVALIER: Object to form.    8 THE WITNESS: What allegation?    9 BY MR. CARSON:    10 Q. Well, there was an allegation that he    11 subjected Lea Merville to quid pro quo sexual    12 harassment, right?    13 THE COURT REPORTER: What was that, Seth?    14 MR. CARSON: Quid pro -- he subjected Lea    15 Merville to quid pro quo sexual harassment.    16 MR. CAVALIER: Object to form and    17 foundation.    18 THE WITNESS: That there are rumors going    19 around are not my concern. If Lea Merville    20 came to me and said there was a problem, I    21 would've dealt with that. I'm not gonna deal    22 with rumors.    23 BY MR. CARSON:    24 Q. When the director of human resources comes</p>	<p style="text-align: center;">it?</p> <p>1 it?    2 MR. CAVALIER: Object to form and    3 foundation.    4 THE WITNESS: I don't know.    5 BY MR. CARSON:    6 Q. I mean, there was a recording we heard    7 today where a Washington Examiner reporter said that    8 Gregg Roman tried to lure her to his hotel room to    9 trade sex for stories, right? That's what we heard    10 today?    11 MR. CAVALIER: Object to the    12 categorization, the lack of foundation, the    13 description of the recording, and essentially    14 everything else you just said, but to the    15 extent you can answer --    16 MR. CARSON: Yeah, of course. I know.    17 Just object to the whole question because why    18 answer when this has nothing to do --    19 everything to do with the case.    20 BY MR. CARSON:    21 Q. Okay. So she said that he told her, I    22 have a killer story. She said -- she said, Alana,    23 tell him why you should have the story. You and me    24 should be in an arrangement. He then whipped out</p>	<p style="text-align: center;">---</p>
	<p style="text-align: center;">---</p> <p>1 to you, it rises above being just a rumor at that    2 point, correct?    3 MR. CAVALIER: Object to form.    4 THE WITNESS: That is a hypothetical.    5 BY MR. CARSON:    6 Q. Well, it's not a hypothetical. Marnie    7 Meyer, in fact, came to you and included allegations    8 about Lea Merville in a written report to you    9 submitted to you in November 2018, correct?    10 A. Yes.    11 Q. And the allegations concerning Lea    12 Merville was that Gregg Roman lured her to a hotel    13 room because she needed a document signed?    14 A. If Lea Merville had come to me and    15 complained, I would've dealt with it. There was a    16 rumor that Marnie Meyer retold to me. I did not pay    17 attention. I paid attention to my staff who had a    18 large complaint about Gregg. They were very unhappy    19 with him for a whole range of reasons. I put    20 everything else aside, and I devoted a week to    21 dealing with this to their satisfaction.    22 Q. The allegation that Lea -- that concerned    23 Lea Merville is eerily similar to the allegation    24 that we listened to today on the recording, isn't</p>	<p style="text-align: center;">Page 150</p> <p>1 his penis. She was embarrassed for him. He then    2 screamed across the -- across the -- you know, from    3 outside what room number he's in and said, you have    4 30 minutes to be here. I mean, it's the exact same    5 thing that Lea Merville was -- what was reported in    6 connection with Lea Merville, right?    7 MR. CAVALIER: Object to form, foundation,    8 lack of authenticity.    9    10 (Indistinguishable cross-talk.)    11    12 THE WITNESS: I believe we're dealing with    13 a legal process, and a legal process is not    14 about hearsay; it's about individuals speaking    15 on the record for themselves. Neither Alana    16 Goodman nor Lea Merville has ever contacted me    17 for anything related to Gregg, and, therefore,    18 they were not my concern. My concern were the    19 employees of the Middle East Forum who    20 complained to me in person about specifics, and    21 I put everything else aside in my life and    22 spent a week to deal with those issues. I    23 investigated them and I mitigated them to their    24 entire satisfaction. They signed documents</p>	<p style="text-align: center;">Page 152</p> <p>---</p>

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1	<p>indicating they were happy with the resolution. Gregg signed a document saying he was happy with the resolution. He was content with the -- "happy" is too strong a word. Everyone was content with the resolution. May not be ideal, but it was content -- they were contented with it. I did not need to go into other matters, and I will not be baited into getting into those matters here. I dealt with the issues in front of me effectively, to everyone's contentment.</p> <p>BY MR. CARSON:</p> <p>Q. The matters we're talking about are the subject of this case, though, aren't they?</p>	<p>1 a close personal relationship in which they told each other all sorts of things about their lives, including their bodily issues, sexual issues, their relationships with all sorts of people and the like. That is their business, not mine.</p> <p>6 Q. Are they on equal footing?</p> <p>7 A. They were supervisor and supervisee. They 8 became friends, and that was a mistake. That's at 9 the heart of this, that Gregg should not have done 10 that. He made a mistake.</p> <p>11 Q. It's more than just supervisor and 12 supervisee, though, right, because Gregg Roman's 13 also a corporate officer of the entity, the Middle 14 East Forum, correct?</p> <p>15 A. What is your question?</p> <p>16 Q. Do you know what proxy liability is?</p> <p>17 A. No, I don't.</p> <p>18 MR. CAVALIER: Object to form.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. Well, Gregg Roman is a corporate officer 21 of the Middle East Forum, so the conduct and 22 comments that he made, those conduct and comments 23 are from the Middle East Forum.</p> <p>24 MR. CAVALIER: Is that a --</p>	
1	<p>about this. Yes.</p> <p>2 BY MR. CARSON:</p> <p>3 Q. And Daniel -- strike that. And Lisa 4 Barbounis, my client, said that, as part of the 5 sexual harassment that she was subjected to, Gregg 6 Roman described in detail him having sex with Lea 7 Merville. That's why it's relevant to this case. 8 Do you understand?</p> <p>9 MR. CAVALIER: Object to form, if that's a 10 question.</p> <p>11 BY MR. CARSON:</p> <p>12 Q. Do you understand that that's the 13 relevancy of this case? When your supervisor 14 decides he's gonna tell the person that he's in 15 charge of intimate details about his sexual life, 16 that's sexual harassment, right?</p> <p>17 MR. CAVALIER: Object to form. Object to 18 calling for a legal conclusion as well.</p> <p>19 MR. CARSON: You don't need to say 20 [inaudible].</p> <p>21 BY MR. CARSON:</p> <p>22 Q. It's sexual harassment. It's unwelcome 23 sexual comments, right?</p> <p>24 A. From what I understand, Lisa and Gregg had</p>	<p>1 Page 154</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>	<p>1 Page 156</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>

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1	them, and I mitigated them to their satisfaction.	1	Q. Is the Middle East Forum a victim in this case?
2	MR. CARSON: Sorry. Can you read -- I'm	2	A. Of course it is. Of course it is. \$31
3	sorry -- I just got distracted. Can you read	3	million for what, for made up stuff? Tricia McNulty
4	back his answer?	4	tells me that he sat too close to her, and then the
5	---	5	complaint comes in. Oh, he tried to touch her
6	(Whereupon the court reporter read back	6	bottom. Oh, really? Somehow it magically changed
7	the pertinent testimony.)	7	between November and June. Wonder how that
8	---	8	happened. Sex trafficking? Oh, where did that come
9	THE WITNESS: I investigated them, and I	9	from? Sexual assault? Where did all these things
10	mitigated them to their satisfaction.	10	come from? Who came up with sex trafficking?
11	BY MR. CARSON:	11	Mr. Carson, who came up with sex trafficking?
12	Q. You don't see yourself as having some	12	Q. The United States Congress, Mr. Pipes.
13	particularized responsibility to make sure the women	13	A. United States Congress did not apply to
14	at the Middle East Forum who complained about sexual	14	Gregg Roman; Seth Carson did.
15	harassment are protected?	15	Q. Have you ever read the statute because --
16	MR. CAVALIER: Object to form. Asked and	16	A. I've read what you have produced and what
17	answered.	17	words you put into their mouths.
18	THE WITNESS: Yes, and, accordingly, I	18	Q. Have you ever read the sex trafficking
19	removed Gregg from the office and from any	19	statute --
20	direct contact with them in a physical presence	20	---
21	in their life, and I protected them entirely.	21	(Indistinguishable cross-talk.)
22	They were content with that protection until	22	---
23	you came along five months later and decided it	23	---
24	wasn't good enough.	24	THE WITNESS: I do not need to know about
	Page 158		Page 160
1	---	1	---
2	BY MR. CARSON:	2	the details of sex trafficking laws. I need to
3	Q. I know. It's my fault. I get it. It's	3	know that that's what you claimed.
4	not your fault in any way, correct?	4	BY MR. CARSON:
5	A. They signed documents saying they were	5	Q. So you don't know whether it applies to
6	content with it. Nobody complained after that	6	this situation or not, do you?
7	point, after they signed the documents.	7	A. I know perfectly well that you make things
8	Q. So you don't feel responsible for anything	8	up as you need to claim your \$31 million, of which
9	at all?	9	you get, what, 40 percent? How much does that come
10	MR. CAVALIER: Object to form.	10	to, Mr. Carson? That seems to come to about \$14
11	---	11	million for you. That's a nice payday.
12	(Indistinguishable cross-talk.)	12	Q. That's what you think --
13	---	13	A. Good luck with that, Mr. Carson. I'll let
14	THE WITNESS: I investigated and I	14	you know that we're not gonna be paying you. We're
15	mitigated the problem to everyone's	15	gonna fight you tooth and nail, as you can see.
16	satisfaction. All four individuals directly	16	Q. Right. And then --
17	involved were content with my resolution of it.	17	A. Good luck with your \$14 million.
18	I thought everything was fine. They indicated	18	Q. If there's a judgment, you'll end up
19	everything was fine. I refer you to the	19	paying it, correct?
20	photographs of May 19th, 2019 at our gala in	20	A. And so far, let me point out, Mr. Carson,
21	New York -- big smiles in a chorus line with	21	you have paid us, not we have paid you. Due to your
22	Gregg and others. Everything was fine, and	22	mistakes, you have paid us, and, indeed, just a few
23	then all of a sudden we got big problems. Why?	23	minutes ago, you got another problem with Judge
24	Well, Derek Smith Law Group entered the scene.	24	Wolson, didn't you?
	BY MR. CARSON:		Q. How much money have you received from our

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1	<p style="text-align: center;">---</p> <p>firm?</p> <p>A. Something on the order of \$5,000.</p> <p>Q. And that was profit for you guys?</p> <p>A. No.</p> <p>MR. CAVALIER: Object to form.</p> <p>THE WITNESS: It was the money that we had to pay our lawyers because of your -- your actions.</p> <p>BY MR. CARSON:</p> <p>Q. So how much money have you made from our firm?</p> <p>MR. CAVALIER: Object to form.</p> <p>THE WITNESS: -- \$5,000.</p> <p>BY MR. CARSON:</p> <p>Q. You've made \$5,000?</p> <p>A. We didn't make it. We paid it to our lawyers because they had to spend time dealing with the things you raised wrongly.</p> <p>Q. When did you pay it to your lawyer?</p> <p>MR. CAVALIER: Object to form. Hold up, hold up. Do not answer any questions about bills or payments or --</p> <p>MR. CARSON: He raised the issue, Jon, not me.</p>	Page 162	<p style="text-align: center;">---</p> <p>A. I don't know why. Something to do with her busyness or something, but --</p> <p>Q. Isn't it -- go ahead. You wanna finish?</p> <p>A. But he invited Lisa to go to Israel to do work with him. That was not sex trafficking.</p> <p>Q. Isn't it -- did you know that she went?</p> <p>A. I know that she went now. At the time, I did not.</p> <p>Q. He hid it from you, correct?</p> <p>A. He hid it from me. And, by the way, so did Lisa hide it from me. The two of them were complicit in hiding it from me.</p> <p>Q. Well, Lisa was following instructions, though, right?</p> <p>A. Lisa hid it from me. Gregg hid it from me, and I --</p> <p>Q. Lisa was following the instructions of her supervisor?</p> <p>A. Lisa hid it. She was upset by -- if she had a problem with it, she could've come to me. As you have pointed out repeatedly, I was the ultimate authority. And when she did come to me on November 1st, I took action. So why didn't she come to me back in March or April when she had a problem?</p>
1	<p style="text-align: center;">---</p> <p>MR. CAVALIER: The instruction stands.</p> <p>THE WITNESS: So far, you have paid us. We have not paid you. I remind you of that. And you have more problems on your docket, don't you? Daily reports to the judge. Remember those, Mr. Carson.</p> <p>BY MR. CARSON:</p> <p>Q. I'm gonna direct you back to the question that we were discussing a moment ago in connection with the sex trafficking statute. Have you ever reviewed that statute before?</p> <p>A. I deal with the Middle East, Mr. Carson. I don't read sex trafficking statutes, but I know what the term means, and I know that Gregg did not engage in sex trafficking.</p> <p>Q. Well, if you lure someone across national borders in order to try to engage them in sexual intercourse, isn't that what the statute states?</p> <p>A. Only a perverted mind like your own would come up with an interpretation like that. He went there to work. He asked Matt Bennett first, he asked Marnie Meyer second, and he asked Lisa Barbounis third.</p> <p>Q. Why didn't Marnie Meyer wanna go?</p>	Page 164	<p style="text-align: center;">---</p> <p>Q. Wasn't she just following the instructions of her supervisor?</p> <p>A. She hid it from me. She was complicit in hiding it from me, and when she decided no longer could it be complicit, it was eight months -- seven, eight months later. How come she didn't do it at the time, Mr. Carson? Maybe because nothing happened at the time, and she was only looking for a vehicle with which to come to me en masse, all three of them, and find a reason to get my attention. They felt safety in numbers, safety in arguing for sexual harassment. I don't know why. There was no indication that I would not take it seriously individually back in the spring, but that's what they chose to do. So she was complicit. They both did something wrong, and I've admonished Gregg.</p> <p>Q. What did Gregg do wrong?</p> <p>A. He hid it from me.</p> <p>Q. Isn't the reason that he didn't want Marnie -- isn't the reason Marnie didn't wanna go is because Gregg told her that she would have to share a room with him?</p> <p>MR. CAVALIER: Object to form.</p> <p>THE WITNESS: Ask her. Don't ask me her</p>

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1	--- reasoning.	1 we're definitely gonna call the judge if you 2 make that instruction.
2	BY MR. CARSON: 3 Q. Sorry? 4 A. Ask her, not me. 5 Q. Well, isn't that her plea? 6 A. I don't know. 7 Q. You don't know what her claims are in her 8 case? 9 MR. CAVALIER: Object to form. 10 THE WITNESS: -- talking about Lisa 11 Barbounis now.	3 THE WITNESS: I think I -- 4 MR. CARSON: Not a choice. You can't 5 instruct someone not to answer based on lack of 6 foundation. 7 --- 8 (Indistinguishable cross-talk.) 9 ---
12	BY MR. CARSON: 13 Q. But you testified that he didn't try to 14 lure her there for sex. 15 A. That's correct. He took her there to do 16 work, and apparently she did do work. 17 Q. But the work could only be done if they 18 shared a hotel room together or an Airbnb together? 19 MR. CAVALIER: Object to form, foundation. 20 THE WITNESS: I know nothing about their 21 arrangements and why they had the arrangements 22 they did. Ask --	10 MR. CAVALIER: You're mischaracterizing -- 11 you're mischaracterizing the allegations -- 12 MR. CARSON: Here is where you try to help 13 him testify. Go ahead, Jon. Tell him what to 14 say. 15 MR. CAVALIER: You're asking me to explain 16 my objection. I have to do that. 16 MR. CARSON: -- to say. Take a minute. 17 I'll allow you to tell him what to say. Go 18 ahead. 19 MR. CAVALIER: I stand on the instruction. 20 THE WITNESS: I can answer. Jon, I would 21 like to -- 22 MR. CARSON: What does it indicate to -- 23 ---
23	BY MR. CARSON: 24 Q. Well, isn't it evidence of the reason why	24 ---
	Page 166	Page 168
1	he wanted to bring her, that Marnie Meyer wouldn't 2 go unless -- that he wouldn't let Marnie Meyer go 3 unless she shared a room with him? 4 MR. CAVALIER: Object to form. 5 BY MR. CARSON: 6 Q. Doesn't that indicate something to you, 7 Mr. Pipes? 8 A. Ask Marnie Meyer. 9 Q. The question's not directed to Marnie 10 Meyer. It's directed to you. What do you think it 11 indicates -- I'll strike that. I'll ask another 12 question. What do you think it indicates that he 13 would only allow her to come if she shared a room 14 with him? 15 MR. CAVALIER: Are you asking a 16 hypothetical? 17 MR. CARSON: No. 18 MR. CAVALIER: Then I'm objecting on lack 19 of foundation, and I'm instructing him not to 20 answer it. 21 MR. CARSON: You can't instruct him not to 22 answer. 23 MR. CAVALIER: I just did. 24 MR. CARSON: Well, you have to answer or	1 (Indistinguishable cross-talk.) 2 --- 3 THE COURT REPORTER: Guys, come on. 4 BY MR. CARSON: 5 Q. The question that I asked was, what does 6 it indicate to you that he didn't want Marnie to go 7 unless she shared a room with him? 8 A. It indicates to me that Marnie was 9 building a case against Gregg to show that he had 10 behaved badly. And so, at a later date, she decided 11 to give this as an explanation. Whether or not that 12 was the explanation at the time, I do not know 13 because she did not tell me. If she were upset 14 about being invited to Israel with Gregg to share an 15 Airbnb -- if that was, in fact, the case -- she 16 should've told me in February, March, April, 17 whenever it was when she got that offer. She did 18 not. She came to me in November, and she did not 19 mention that to me. That came up later when you, 20 Mr. Carson, entered the case, and you decided to 21 find all sorts of reasons to impugn Gregg Roman, so 22 I -- 23 Q. Sure about that? 24 A. Hm?

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1	<p style="text-align: center;">---</p> <p>Q. You sure?</p> <p>A. I'm not sure of the dates, but I know that she didn't tell me that in November. That came --</p> <p>Q. It wasn't in the letter?</p> <p>A. In the letter, I don't think so, no.</p> <p>Q. Well, we'll have plenty of time to look at the letter today but --</p> <p>A. In any case, she did not come to me at the time in February, March, April, whenever it took place and tell me, Gregg made an inappropriate offer to me to go to Israel and to stay in a hotel room with him -- in an Airbnb with him. She did not do that. She was complicit as well in hiding this from me. I did not know about it until she wrote me that memo in early November. Of that I am positive. I knew nothing of this trip. I knew the trip -- I knew Gregg went. I knew nothing about Lisa going there. I knew nothing about Marnie being invited. I knew nothing about the Airbnb. I knew nothing about the alleged assault. Call it what you will. Knew nothing until November. So all of them were complicit in hiding this from me, and then later -- months, months later, eight months later -- they decide, oh, Gregg did all these things, and Marnie</p>	1	<p style="text-align: center;">---</p> <p>Mr. Roman of putting his foot up her butt?</p> <p>A. Yes, yes, of course.</p> <p>Q. Can you understand why it might be hard for women to report sexual misconduct?</p> <p>MR. CAVALIER: Object to form.</p> <p>THE WITNESS: I have a question why it's hard to report it in March, and it's possible to report it in November. They did report it, and I acted expeditiously and satisfactorily. So they had no complaints about my actions, so I don't understand why -- okay, it's difficult to bring up these personal issues, sexual issues, of course. But if it's possible to bring it up in November, why couldn't they have brought it up in the spring? Why couldn't Marnie and Lisa have come to me together and said, oh, we have a problem with Gregg because he invited us to an Airbnb, and he wanted to keep it secret from you. Why didn't they do that? What kind of credibility do they have when they -- don't interrupt me -- when they don't deal with it expeditiously, but wait eight months and wait to recruit another person, and then five months after that --</p>
1	<p style="text-align: center;">Page 170</p> <p style="text-align: center;">---</p> <p>even tells me that she asked Lisa, did Gregg hit on you in Israel, and Lisa -- quote, "Lisa said no," unquote. So what am I supposed to take seriously?</p> <p>Q. Did you ever read that email?</p> <p>A. What do you mean?</p> <p>MR. CAVALIER: Object to form. What email?</p> <p>BY MR. CARSON:</p> <p>Q. I don't know. Are you testifying you got on email?</p> <p>A. No one said that.</p> <p>Q. When did Marnie ask Lisa if something happened in Israel and she said --</p> <p>A. -- the handwritten note -- one wants to call it -- email, note -- of November 1st, 2018.</p> <p>Q. So on November 1st Marnie said that she asked Lisa if something happened in Israel and that Lisa said no?</p> <p>A. Exactly. "Lisa said no." Three words. Exact.</p> <p>Q. Did you learn anything else on November 1st?</p> <p>A. Yes. Lots of things.</p> <p>Q. Did you learn that Lisa had accused</p>	1	<p style="text-align: center;">Page 172</p> <p style="text-align: center;">---</p> <p>no -- eight months after that, recruit two more, and they go to you, or you go to them. Who knows? But now safety in numbers sort of thing. Well, no, no. They should've reported this back in the spring when it took place and told me, and if it was so difficult, how come they could do it in November? What's the difference between the spring and the fall? So --</p> <p>BY MR. CARSON:</p> <p>Q. Why don't you answer your own question? Can you think of anything?</p> <p>A. I am not going to try and interpret their minds. All I know is that they waited a long time, and they concocted stories for my benefit, and I took them at face value, and I took expeditious steps to clear up that problem from their lives, which I did, and they signed documents saying they were content with my [inaudible]. So they have no grounds to stand on, you have no grounds to stand on, and you should just close this whole damn thing down.</p> <p>Q. Can you think of any reasons why they reported it in November 2018?</p>

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1	<p style="text-align: center;">---</p> <p>A. You ask them, not me, why they did it.</p> <p>Q. Well, you keep saying that they concocted.</p> <p>What do you mean by "concocted"? You mean made the whole thing up?</p> <p>A. They made things up, yes. Lisa told Marnie that she had not been hit on by Gregg. I learned that November 1st in the morning. That afternoon, I went in and Lisa told me she had been hit on by Gregg. Excuse me.</p> <p style="text-align: center;">---</p> <p>(Indistinguishable cross-talk.)</p> <p style="text-align: center;">---</p> <p>THE WITNESS: -- she would've come to me at the time and told me. She would not have waited eight months. I do not believe it, no. I acted as though -- I acted on face value. I took it very seriously, and I took him out of their lives.</p> <p>BY MR. CARSON:</p> <p>Q. Did you read any text messages that Lisa sent while she was in Israel?</p> <p>A. She showed me her text messages, and none of them indicated that he had assaulted her. She said she was uncomfortable, et cetera, et cetera,</p>	1	<p style="text-align: center;">---</p> <p>A. Something along those lines, yes.</p> <p>Q. She say that she'll stab him?</p> <p>A. She has said that she will stab him, yes.</p> <p>She has often said that she wants to kill him and stab him. She loathed him.</p> <p>Q. She often told you that she wants to kill him?</p> <p>A. Yeah. She said --</p> <p>Q. How often did she say that?</p> <p>A. No, no. She didn't tell me. She wrote that in her emails, in her texts and so forth.</p> <p>Yeah. That's her --</p> <p>MR. CARSON: Can you hear? I'm having a tough time --</p> <p>THE COURT REPORTER: It's tough.</p> <p>MR. CARSON: Are you getting it all?</p> <p>THE WITNESS: I'm speaking very loud. I'm sorry.</p> <p>THE COURT REPORTER: Yeah, it's very quiet on my end, so please speak up.</p> <p>BY MR. CARSON:</p> <p>Q. You just have a naturally quiet voice, Mr. Pipes. We're not trying to be --</p> <p>A. Okay.</p>
1	<p style="text-align: center;">---</p> <p>or, at least, that's what the text messages that she showed me said. Were they actually sent at the time from Israel? I don't know. I did not look at the metadata. She just showed me text messages allegedly from her to her husband. I took them at face value. I did not do an inquiry. I did not ask for the metadata or anything like that. I just took everything at face value. Though, now, two years later, I'm gonna say, show me the metadata. Show me [inaudible]. Show me that this actually happened. But, in fact, if you look even at what she showed, she didn't ever allude to any kind of assault. She was weirded out. She was uncomfortable. He was talking about this and that, but nothing -- the striking thing about her text messages, they don't actually refer to his touching her. They don't refer to it. So, yeah, clearly, if those text messages are valid, she was uneasy in the circumstance but --</p> <p>Q. Did she say she was scared?</p> <p>A. I don't remember the exact words, but, yeah, she was uneasy.</p> <p>Q. Did she say she wanted to sleep with a knife under her pillow?</p>	1	<p style="text-align: center;">---</p> <p>Q. All right. Let's -- let's take a minute and go through some stuff. Okay. Do you see this document here I just put in front of you?</p> <p>A. Yep.</p> <p>Q. Do you remember writing this on 11/2/18?</p> <p>A. No.</p> <p>Q. Wanna take a minute and read through it real quick?</p> <p>A. Okay. Okay.</p> <p>Q. Do you remember writing it now?</p> <p>A. No, I don't remember writing it, but I recognize it, yeah.</p> <p>Q. So all three women on 11/1/2018 made allegations of unwanted sexual advances, correct?</p> <p>A. Correct.</p> <p>Q. What you said in the letter?</p> <p>A. Yep, reporting.</p> <p>Q. So on November 1st, 2018 Lisa was one of the women who made allegations of unwanted --</p> <p>A. Yes, of course.</p> <p>Q. -- advances, right?</p> <p>A. Yes.</p> <p>Q. Because you also said that she said no on 11/1/18, so I'm just trying to understand.</p>

	Page 177		Page 179
1	---	1	---
2	MR. CAVALIER: Objection.	2	A. Yeah.
3	Mischaracterization.	3	Q. So you investigated it in one day?
4	THE WITNESS: I did not say that. I said	4	A. Yes.
5	that the handwritten email from Marnie to me	5	Q. And here is what I found. These women who
6	that I read early in the morning on	6	work for you made unwelcome -- strike that -- say
7	November 1st quoted Lisa -- paraphrased Lisa as	7	that you made unwanted sexual advances -- I can read
8	saying no in answer to the question, did Gregg	8	this to myself. Hang on a second. So my next
9	make advances on you. But, as you can see, I	9	question is, Gregg Roman said that he acknowledges
10	took their testimonies, I confronted Gregg with	10	his conduct was not acceptable, right?
11	it, and I dealt with it. You have it all right	11	A. Yes.
12	here in black and white.	12	Q. What about his conduct wasn't acceptable?
13	BY MR. CARSON:	13	A. Ask them.
14	Q. Well --	14	Q. Well, he said it to you during your
15	A. -- have in black and white is that they	15	investigation, so I'm asking you.
16	said they were satisfied with this solution.	16	A. Ask him. Ask them. I mean, I'm reporter
17	Q. So I haven't seen --	17	here. I'm not mind reader.
18	A. -- they came back and said, oh, no, we're	18	Q. Well --
19	not satisfied. We want \$31 million.	19	A. Investigator.
20	Q. I haven't seen the email you keep	20	Q. If he said that his conduct was not
21	referring to, so I'll ask that you please produce	21	acceptable, then why are you trying to say that
22	the November 1st, 2018 email from Marnie Meyer where	22	everything's made up in this case?
23	Marnie Meyer writes that Lisa denied being	23	MR. CAVALIER: Object to form. Object to
24	sexually -- being subjected to sexual harassment.	24	the mischaracterization.
	A. I can send it to you right now. I don't	BY MR. CARSON:	
			Page 180
1	know what the protocol is, but I can send it.	1	---
2	Q. Well, when we get a break -- I mean, you	2	Q. You can answer.
3	guys -- can you hear him? I didn't hear what he	3	A. He acknowledged, broadly speaking, that he
4	just said.	4	made a mistake in having close friendships with his
5	A. I said I can send it to you. I don't know	5	staff, with the people reporting to him.
6	what the protocols are, but I have it, and I can	6	Q. His friendships weren't acceptable? I'm
7	send it to you.	7	sorry. Go ahead.
8	Q. Well, maybe on a break you can --	8	A. He acknowledged that that was a mistake.
9	MR. CAVALIER: Seth, you have the Marnie	9	He now understands -- he understands for two years
10	Meyer note.	10	now that it's a mistake to have close personal
11	MR. CARSON: Is that what he's referring	11	relations with people who you are supervising at
12	to, the handwritten --	12	work. This is a bad idea. I didn't know about it.
13	MR. CAVALIER: Yes. I believe the	13	I didn't know he was so close to them. I knew he
14	handwritten note was put -- was attached to an	14	went to lunch with them, but I didn't know he had
15	email that was sent to Daniel. I think that's	15	drinks, and I didn't know he went off to Israel. I
16	the discrepancy here.	16	didn't know about all these things. When I learned
17	MR. CARSON: If that's what he's referring	17	about it, I came down on him and said this is wrong.
18	to, I have it.	18	You made a mistake. And he said, yeah, I made a
19	THE WITNESS: Handwritten note attached to	19	mistake.
20	photograph and sent to you by email.	20	Q. Well, he said that his conduct was not
21	BY MR. CARSON:	21	acceptable, was what he said, right?
22	Q. Okay. So it says here -- it says,	22	A. Yeah. I've just explained to you that
23	accordingly, you investigated this matter yesterday	23	having close relations with people you supervise is
24	immediately upon learning of it. Do you see that?	24	not acceptable.
			Q. Why isn't it acceptable, because of the

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1	<p>power dynamic?</p> <p>2 MR. CAVALIER: Object to form.</p> <p>3 THE WITNESS: It's --</p> <p>4 BY MR. CARSON:</p> <p>5 Q. Is that why?</p> <p>6 A. It's wrong for supervisors to be close to</p> <p>7 their -- the people they supervise.</p> <p>8 Q. And why?</p> <p>9 A. -- maintain -- because it complicates</p> <p>10 things in all sorts of ways, as we can see right</p> <p>11 here. Not a good idea. Do what you want on your</p> <p>12 time. Stay away from close relations with people</p> <p>13 you supervise.</p> <p>14 Q. Were you Lisa Barbounis' supervisor at</p> <p>15 this time?</p> <p>16 A. I was not.</p> <p>17 Q. So if Gregg Roman, her supervisor, directs</p> <p>18 her to do something, and then she doesn't tell you</p> <p>19 about it, why would you think that she's complicit?</p> <p>20 A. Why are we going over this again?</p> <p>21 MR. CAVALIER: Yeah. Object to --</p> <p>22 THE WITNESS: -- came to me in November.</p> <p>23 Why didn't she come to me in, let's say, March</p> <p>24 when the -- I don't remember when it was --</p>	<p>1 I don't know if AIPAC was before that or after that,</p> <p>2 but I'm sure they could've found some other reason</p> <p>3 to -- some other person to come up with a reason.</p> <p>4 They had numbers. They had two of them, and there</p> <p>5 was no indication whatsoever that either of them</p> <p>6 would be fired. That was just a fear they had. No</p> <p>7 indication. And, for that matter, no indication</p> <p>8 anytime after that. I didn't fire anybody. I had</p> <p>9 no hint of firing anybody. I had no intention to</p> <p>10 fire anyone. I called them my angels and my heroes,</p> <p>11 and I wanted it to work.</p> <p>12 Q. Gregg acknowledged that his conduct put</p> <p>13 these women in a difficult position, correct?</p> <p>14 A. Yes.</p> <p>15 Q. So maybe that's the position they put him</p> <p>16 in is whether or not to -- well, you tell me. What</p> <p>17 was the difficult position?</p> <p>18 A. I just explained it to you.</p> <p>19 Q. Right, agreed. Okay. "You put this in</p> <p>20 the context of calling yourself a 'social junkie'</p> <p>21 who seeks constant social interaction." Did he</p> <p>22 explain what he meant by that?</p> <p>23 A. I think it's self-evident, isn't it?</p> <p>24 Q. I do, actually. So are you aware -- have</p>
	Page 182	Page 184
1	<p>let's say March was when the Israel trip was.</p> <p>2 Why did she not come to me? Why did she hide</p> <p>3 the whole trip from me? Why did Marnie not</p> <p>4 tell me about what she was offered to do in</p> <p>5 Israel? Why did they wait eight months?</p> <p>6 BY MR. CARSON:</p> <p>7 Q. Is it possible she was --</p> <p>8 A. Obviously, they were not scared because</p> <p>9 they came to me, but they waited eight months.</p> <p>10 Isn't that a little suspicious, Mr. Carson?</p> <p>11 Q. No, not at all. Not even a little bit.</p> <p>12 A. I see. So waiting eight months to come</p> <p>13 with allegations is perfectly normal and enhances</p> <p>14 their credibility, does it?</p> <p>15 Q. Yes.</p> <p>16 A. Okay.</p> <p>17 Q. The reason why is because if they were</p> <p>18 scared of losing their jobs, maybe they felt some</p> <p>19 sort of safety in numbers by telling you the</p> <p>20 complaints all at the same time. Did you ever</p> <p>21 consider that?</p> <p>22 A. They had numbers. As I pointed out to you</p> <p>23 previously, Marnie and Lisa knew of each other's</p> <p>24 offers to go to Israel. They could've come to me.</p>	<p>1 you ever done any research into people who have --</p> <p>2 who commit serial sexual misconduct?</p> <p>3 A. I have not. Mr. Carson, I've told you</p> <p>4 repeatedly I specialize in the Middle East, not</p> <p>5 these matters. This is your area, not mine.</p> <p>6 Q. Well, since you have someone like Gregg</p> <p>7 Roman working for you, do you think maybe you</p> <p>8 should've done some research like that?</p> <p>9 MR. CAVALIER: Hey, Seth. Come on, man.</p> <p>10 I mean, really?</p> <p>11 MR. CARSON: No. It's a serious question.</p> <p>12 THE WITNESS: I was approached by three</p> <p>13 employees with complaints -- far-reaching</p> <p>14 complaints about all sorts of topics. I</p> <p>15 investigated and mitigated. I did not do</p> <p>16 research into their personalities. I did not</p> <p>17 do psychological research. I did not do legal</p> <p>18 research. I did research into what is going</p> <p>19 on, and I mitigated it to their satisfaction.</p> <p>20 I don't see why you are suggesting that I</p> <p>21 should also have gone into all sorts of arcane</p> <p>22 research about psychology. No. I dealt with</p> <p>23 the problem in front of me. I'm a Middle</p> <p>24 East specialist. I'm the head of an organization.</p>

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1	I deal with problems when they arise. I did 2 that here. I spent a week on it. I mitigated 3 it to everyone's contentment. What more do you 4 want?	1	organization. That's what I do, and I deal 2 with the problem, and I move on, and I think 3 this is a perfect example of dealing with a 4 problem and moving on.
5	BY MR. CARSON:	5	BY MR. CARSON:
6	Q. I wasn't suggesting that you seek out 7 arcane psychological research, but maybe current 8 psychological research, maybe talk to an expert. 9 Did you ever consider doing that?	6	Q. Well, I do, too, Mr. Pipes.
10	MR. CAVALIER: Object to form.	7	A. Thank you.
11	THE WITNESS: I did not need to talk to an 12 expert. I needed to talk to the individuals 13 who come to me and complain and listen to them 14 carefully and figure out a solution.	8	Q. The moving on part is the problem, though, 9 right? You moved on before the issues were actually 10 dealt with, correct?
15	BY MR. CARSON:	11	A. No. I dealt with all the issues. All 12 four of the principals in this issue were content 13 with the resolution I came up with. And, if you 14 don't know it, I have signed documents by all four 15 of them to that effect. Yes, they didn't like one 16 or another aspect of it, but they signed it and 17 moved on. There were no complaints, not a single 18 complaint. If there had been, I would've acted on 19 it.
16	Q. Well, based on some of the complaints that 17 we heard today, it does appear Mr. Roman has an MO, 18 doesn't it?	20	Q. Other than November 2018?
19	MR. CAVALIER: Object to form.	21	A. After the beginning of November. It was 22 all consolidated in this one week. Nothing before, 23 and nothing after.
20	THE WITNESS: I know nothing about 21 Mr. Roman's private life.	24	Q. You definitely made that clear today. So
22	BY MR. CARSON:		Page 188
23	Q. Isn't it your job to know something about 24 it?		
	Page 186		
1	MR. CAVALIER: Object --	1	you never had another credible unwanted allegation 2 of sexual advances by Mr. Roman to a female staffer? 3 See this sentence here? I can ask a better 4 question. You write here that you acknowledge 5 that -- you're telling Gregg that he acknowledges 6 that, in the future, if there's another credible 7 unwanted sexual advance --
2	THE WITNESS: It is not my job to know 3 about Mr. Roman's or any other employee's 4 private life. I am only concerned if what they 5 do affects the Middle East Forum. So we had 6 another instance of that, I might remind you, 7 where Lisa Barbounis was going off to Britain, 8 and she was engaged in activities which are 9 harmful to the Middle East Forum. She can go 10 where she wants and do what she wants, but she 11 can't engage in activities which are harmful to 12 us, and so I protested them repeatedly. So 13 whenever -- whether it be Gregg or Lisa or 14 anyone else engages in activity which I deem 15 harmful, particularly in conjunction with Marc 16 on a legal basis, harmful to what we -- our 17 work, I will bring it up. But if it's not 18 harmful, Lisa can do what she wants. If it's 19 not harmful, Gregg can do what he wants. I am 20 not their den mother. I'm the head of an 21 organization. I'm concerned about the efficacy 22 and credibility of the organization. I have to 23 raise funds for the organization. I'm 24 responsible for the employees of the	8	A. It doesn't say --
		9	---
		10	(Indistinguishable cross-talk.)
		11	---
		12	THE WITNESS: A credible. Not another 13 credible. A credible.
		14	BY MR. CARSON:
		15	Q. I'm sorry. Say that again, Mr. Pipes.
		16	A. You misread that. You said another
		17	credible unwanted sexual advance, implying that I
		18	accepted the accusations against him were credible.
		19	I didn't write that. I wrote, if there is a future
		20	case of a credible unwanted sexual advance, then I
		21	will fire you, but I didn't imply that -- I took
		22	seriously that I believed them. I took them
		23	seriously, but it's a fine line. I took it
		24	seriously and acted upon these complaints, but I did

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1	<p style="text-align: center;">---</p> <p>not actually believe them.</p> <p>Q. You never believed them, correct?</p> <p>A. No. Well, I mean, what is there to believe about a sexual advance when a woman says to a man, I'm not gonna sleep with you? That is not exactly...</p> <p>Q. Mr. Pipes, what about that she felt the need to point that out, though?</p> <p>A. Well, that's not our case here, is it?</p> <p>Q. So Mr. Pipes agreed to the -- strike that. So Mr. Roman agreed to the new structure governing the employee, the employment relationship between Mr. Roman and the female staffers, right?</p> <p>A. Yes. You have, I'm sure, the agreement between -- signed agreement between Gregg and me.</p> <p>Q. It looks like this is an email from Ms. McNulty, and it's addressed to you, and Marc Fink is cc'd on it, and I think she's actually responding to an email that you wrote her. So you see on Sunday, November 4th at -- strike that. On Sunday, November 4th, 2018 at 11:34 p.m., you sent an email with the subject line, "Allegations and consequences," correct?</p> <p>A. Correct, except it's a.m., not p.m.</p>	Page 190	<p style="text-align: center;">---</p> <p>about it.</p> <p>Q. You might be a faster reader than me. Are you --</p> <p>A. "On November 1st, I confirmed with you that I was aware of certain indiscretions between" -- da, da, da, da -- "during a trip to Israel in May."</p> <p>Q. Take a minute and just read it to yourself, and tell me when you're ready.</p> <p>A. Okay.</p> <p>MR. CAVALIER: Seth, if you got a natural break point coming up, it's almost --</p> <p>MR. CARSON: Wanna do it now? You wanna just do it now?</p> <p>MR. CAVALIER: -- 2:15. We can if you want to. I'm just thinking maybe we break for a half hour for lunch.</p> <p>MR. CARSON: Yeah. We can just do it now, whatever. We'll do this document when we get back.</p> <p>MR. CAVALIER: That works for me. You okay with that, Daniel?</p> <p>THE WITNESS: Yeah.</p> <p>THE VIDEOGRAPHER: All right. So it is</p>
1	<p>Q. Thank you -- a.m. -- and you sent -- you copied and pasted and sent this exact email to Ms. McNulty, Ms. Meyer, and Ms. Barbounis, correct?</p> <p>A. Correct.</p> <p>Q. And you -- I mean, I can show them to you, but I'll represent to you you sent all three of them at 11:34 a.m. on November 4th. Do you remember that?</p> <p>A. Yep. I don't know if I remember, but, yeah, I see it.</p> <p>Q. And I think that later the same day -- that evening, Ms. McNulty replied.</p> <p>A. Mm-hmm. Well, thank you for pointing this out because it shows that she, too, is complicit --</p> <p style="text-align: center;">---</p> <p>(Indistinguishable cross-talk.)</p> <p style="text-align: center;">---</p> <p>THE WITNESS: She also was aware of it, so all three were complicit.</p> <p>BY MR. CARSON:</p> <p>Q. Wait. What are we talking about now? What are they complicit in?</p> <p>A. Hiding the trip to Israel and not saying anything -- one, hiding it, and, two, not telling me</p>	Page 192	<p style="text-align: center;">---</p> <p>2:10 p.m., and we are off the record.</p> <p style="text-align: center;">---</p> <p>(Whereupon there was a recess in the proceeding from 2:10 p.m. to 2:49 p.m.)</p> <p style="text-align: center;">---</p> <p>THE VIDEOGRAPHER: The time is 2:49 p.m. Eastern Time, and we are on the record.</p> <p>BY MR. CARSON:</p> <p>Q. All right. Let's do it. Do it to it.</p> <p>All right. So we left off, we were looking at this document, which looks like an email -- like we said before, it's an email. You sent this email to Tricia in the morning, and then she replied. Just tell me whenever you're ready.</p> <p>A. Ready. I am ready.</p> <p>Q. So today you testified that the only thing that was reported to you by Patricia McNulty was that Gregg sat too close to her on the couch. Do you remember that?</p> <p>A. Yep.</p> <p>Q. So this email seems to describe a much more significant incident. Don't you agree?</p> <p>A. Well, this is the next day.</p> <p>Q. Sorry?</p>

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1	<p style="text-align: center;">---</p> <p>A. This is the next day. This is not what she told me in her office. "Gregg put his arm around Lisa and myself and pulled me into him." Yeah, that is different from her initial testimony.</p> <p>Q. Initial what?</p> <p>A. It's different from her initial statement to me.</p> <p>Q. Did you read this?</p> <p>A. I read it, yeah. It's not what she told me on the first -- first time we spoke.</p> <p>Q. I mean, what she describes is that he abruptly asked the three men to leave. "At that point, as the men were trying to wrap up the conversation with Matt, Gregg put his arm around Lisa and myself and pulled me into him so that I was almost in his lap and began whispering in my ear that no other men should be in the room."</p> <p>A. Yep. I see it. That's not what she told me the day before.</p> <p>Q. Yeah, and her complaint alleges that he put his hand underneath her to make that move.</p> <p>A. Right, so she added the first round here and the second round about the hand under her.</p> <p>Q. Oh, so these are -- she's lying, right?</p>	1	<p style="text-align: center;">---</p> <p>MR. CARSON: We're gonna wait for an answer.</p> <p>MR. CAVALIER: Then we're gonna be waiting a long time.</p> <p>MR. CARSON: Fine. Go off the record while we wait.</p> <p>MR. CAVALIER: I disagree. Ask your next question or call the judge. You wanna call Judge Wolson and tell him you want Daniel Pipes, the president of the Middle East Forum, to answer the question about where a woman's vagina is?</p> <p>MR. CARSON: Yeah, because it's relevant --</p> <p style="text-align: center;">---</p> <p>(Indistinguishable cross-talk.)</p> <p style="text-align: center;">---</p> <p>MR. CARSON: Jon, sorry, but it's relevant to the case. The director of the Middle East Forum put his hand underneath my client's butt right next to her vagina, so it's relevant.</p> <p>MR. CAVALIER: You can ask the next question, or you can call the judge.</p>
24	Page 194	BY MR. CARSON:	Page 196
1	<p style="text-align: center;">---</p> <p>A. She's inconsistent. I don't know what the truth is. I wasn't there, but it's inconsistent.</p> <p>Q. Do you know --</p> <p>A. Also point out to you that -- No. 1 below, because I witnessed his -- da, da, da, da, da -- nature, I worry more -- I -- well, she worries more about his vindictive, manipulative, and volatile nature more than sexual advances. So the sexual advances were always secondary matter. It was the management of his team that she was unhappy about and everyone was unhappy about and I was unhappy about. Yeah.</p> <p>Q. Do you know where a woman's vagina is?</p> <p>MR. CAVALIER: Hold on. Really?</p> <p>MR. CARSON: Yes. Do you know where a --</p> <p>MR. CAVALIER: Don't answer that, Daniel.</p> <p style="text-align: center;">---</p> <p>(Indistinguishable cross-talk.)</p> <p style="text-align: center;">---</p> <p>MR. CARSON: You're not cutting anything off, so stop threatening, and, second, he has to answer the question.</p> <p>MR. CAVALIER: No, he doesn't. Don't answer the question.</p>	1	<p style="text-align: center;">---</p> <p>Q. You do understand that a woman's vagina is underneath her, right? Underneath her, right next to her butt?</p> <p>MR. CAVALIER: Same objection, same instruction.</p> <p>MR. CARSON: We're gonna call the judge if I can't ask questions about this.</p> <p>MR. CAVALIER: Call the judge, please. Call Judge Wolson and tell him that you're asking these questions. I --</p> <p>MR. CARSON: They're good questions, Jon.</p> <p>MR. CAVALIER: Then call the judge.</p> <p>MR. CARSON: He's gonna be instructed to answer.</p> <p>MR. CAVALIER: Call the judge.</p> <p>BY MR. CARSON:</p> <p>Q. You do know that, right, Mr. Pipes?</p> <p>MR. CAVALIER: Ask legitimate questions of this witness --</p> <p>BY MR. CARSON:</p> <p>Q. You do know that, right? So you understand why it might be a sensitive subject for her to describe what Mr. Roman did to her, right?</p> <p>You understand that?</p>

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1	MR. CAVALIER: You can answer that	1	A. I don't know. Show me.
2	question, Daniel.	2	Q. You asked her for a written statement, no?
3	THE WITNESS: Ask it again.	3	A. Show me. Show me --
4	MR. CARSON: You can read back my	4	Q. Sure, I'd be happy to show you. I mean,
5	question.	5	do you remember asking her for a written statement?
6	---	6	A. I do not remember notes I sent two years
7	(Whereupon the court reporter read back	7	ago. You have to show them to me. I see no request
8	the pertinent testimony.)	8	for more information. I see three questions. None
9	---	9	of them inquire about -- ask for more information.
10	THE WITNESS: Yes. It's a sensitive	10	She offered it.
11	subject, and it was sensitive in April, and it	11	Q. You never asked her to provide more
12	was sensitive in November, and there's no	12	information?
13	reason in my mind that she should bring it up	13	A. Not in this letter.
14	only, what, seven months later.	14	Q. Did you ever ask her in any other letters?
15	BY MR. CARSON:	15	A. I went around the day before and I
16	Q. Brought it up because she was asking you	16	inquired, what's going on? Tell me everything, and
17	for help, right?	17	she told me that he was too close to her on the
18	A. Yeah.	18	couch. That was it. I remember that distinctly.
19	Q. And you didn't help her, did you?	19	This increased the complaint, and your imaginary
20	A. Of course I did. I --	20	complaint increased it further, that he put his hand
21	Q. What did you do, Mr. Pipes?	21	under her, I think. That wasn't here, and it
22	A. Removed Gregg from her life.	22	certainly wasn't the first day. So she elaborated
23	Q. Forever?	23	on it. What the truth is, I don't know. I just
24	A. Until she was happy to have him back.	24	know that having three different versions of the
	Page 198		Page 200
1	Q. She was happy to have him back throughout	1	same thing makes me skeptical.
2	the entire time after he came back?	2	Q. You don't know what the truth is, right?
3	A. And when the issue came up in March 9th,	3	A. Of course I don't, but I see three
4	she said, I have no problems with Gregg.	4	different versions of it. I can read two, and the
5	Q. Did she ever complain?	5	third one I remember.
6	A. No.	6	Q. Why don't you try reading this sentence
7	Q. Never?	7	here, Mr. Pipes?
8	A. Not after this, and not before this. This	8	A. I didn't ask for more, just what you told
9	was the one time.	9	me already, and she elaborated on what she told me
10	Q. Okay.	10	the day before.
11	A. And I will point out that her note says	11	Q. Did you ask her about the elaboration?
12	that she's more worried about his personality,	12	A. No, I did not. I did not go into --
13	manipulative and so forth, than about sexual	13	Q. Did you ask her any other questions after
14	advances. This was not the issue. It was put	14	that?
15	aside.	15	A. You're interrupting me.
16	Q. But you were wrong when you said that she	16	MR. CAVALIER: Gonna let him answer?
17	only said that Gregg Roman was close to her on the	17	THE WITNESS: I did not go into any --
18	couch, right? That was wrong?	18	MR. CARSON: He answered. He said, no, I
19	A. I'm not wrong. I'm reporting to you what	19	did not.
20	I was told by her on November 1st. The first	20	BY MR. CARSON:
21	escalation was November 2nd, and the second came in	21	Q. Did you ask him about any other questions
22	your imaginary complaints.	22	after that?
23	Q. You asked her for a more detailed report,	23	A. I took at face value the complaints
24	correct?	24	against Gregg, I noted them, and I acted upon them.

	Page 201		Page 203
1	---		
2	Q. You still take them at face value?	1	THE WITNESS: And that they were ginned
3	A. I took them at face value then. I have	2	up --
4	learned a lot since then. I didn't know that	3	BY MR. CARSON:
5	there'd be a third round where she would claim that	4	Q. I asked you a yes or no question,
6	he put his hand under her at this time.	5	Mr. Pipes.
7	Q. Well, how do you think he pulled her onto	6	A. I am allowed to answer as I wish, I
8	her?	7	believe; am I not?
9	A. You're interrupting me again.	8	Q. Actually, not true, but go ahead. You can
10	Q. How do you think he pulled her onto her?	9	finish your response. It was a yes or no question.
11	A. Could I finish --	10	A. What is your question?
12	Q. Answer both questions at the same time.	11	Q. I said, today, you know that they're
13	A. No. I'll finish one, and then you will	12	false?
14	proceed.	13	A. Yes.
15	Q. Do it in the order you wanna do it,	14	Q. So you do know what happened then?
16	Mr. Pipes.	15	A. I know it didn't happen.
17	A. I've lost my train of thought. Could I	16	Q. What didn't happen?
18	ask the court reporter from where I was?	17	A. What these inconsistent, variable
19	---	18	accusations claim happened.
20	(Whereupon the court reporter read back	19	Q. So Gregg Roman never pulled Tricia onto
21	the pertinent testimony.)	20	his lap?
22	---	21	A. I don't know.
23	THE WITNESS: I have learned a great deal	22	Q. That never happened?
24	about these complaints in the two years since.	23	A. I know that she gave three different
	I've been made aware of all sorts of	24	accounts of it, and I find that implausible.
	Page 202		Page 204
1	---		
2	interactions. I can't give you chapter and	1	Q. None of the counts contradict each other,
3	verse, but I've become aware of a far more	2	Mr. Pipes, do they?
4	elaborate ruse than I was aware of at the time.	3	A. They do.
5	I just took it at face value at the time. Now,	4	Q. How? Tell me the contradictions.
6	no, I do not. Now I'm highly skeptical.	5	A. The first time was that he was just too
7	BY MR. CARSON:	6	close to her, which I found odd. That's why I
8	Q. You've learned that Gregg Roman is a	7	remember it so clearly. Too close to her?
9	sexual predator, correct?	8	That's -- in a room full of people on, apparently,
10	MR. CAVALIER: Object to form.	9	couch full of people? Okay. You say so. I
11	THE WITNESS: I've learned that the	10	didn't -- I didn't argue with her. I just took it,
12	accusations against him are false.	11	and I removed him from her life, or at least almost
13	BY MR. CARSON:	12	entirely from her life, so she had only a few
14	Q. I thought you just said you don't know if	13	electronic communications with [inaudible].
15	they're false.	14	Q. Mr. Pipes, how is that a contradiction?
16	A. I didn't know then. I just took it at	15	If he pulled her onto his lap, wouldn't that be too
17	face value in early November 2018.	16	close?
18	Q. So now you know they're false?	17	A. No. That would be different.
19	A. Move ahead to November 2020, and I have	18	Q. It's not too close if he pulls her onto
20	had a lot more information. I have looked at it far	19	his lap? That's okay?
21	more in detail, and I came to the conclusion these	20	A. No. I didn't say it's okay. I said it's
22	are false and --	21	a different complaint. She --
23	Q. So you know what happened?	22	Q. But it's not a contradiction, is it?
24	A. Let me finish --	23	A. She mentioned nothing about pulling him to
	MR. CAVALIER: Let him finish his answer.	24	her on her lap, and she mentioned nothing about

	Page 205		Page 207
<p>1 putting his hand under her in the initial statement 2 she made to me.</p> <p>3 Q. And if he wrapped his hand around her and 4 pulled her onto his lap by using her backside, 5 that's not a contradiction either, right? There's 6 never been a contradiction in Ms. McNulty's 7 statements, has there?</p> <p>8 A. An inconsistency.</p> <p>9 - - - (Indistinguishable cross-talk.)</p> <p>10 - - -</p> <p>11 THE COURT REPORTER: One at a time, guys.</p> <p>12 THE WITNESS: It is a very substantial 13 inconsistency that puts her statements into 14 doubt in my mind.</p> <p>15 BY MR. CARSON:</p> <p>16 Q. There's never been a single 17 inconsistency --</p> <p>18 MR. CAVALIER: Objection. Asked and 19 answered. Daniel, you've answered this 20 already. Seth, move on.</p> <p>21 BY MR. CARSON:</p> <p>22 Q. Right?</p> <p>23 A. Right what?</p>	Page 205	<p>1 A. Lisa was on the other side and couldn't 2 see. She has made that clear.</p> <p>3 Q. Has she made that clear? Were you at her 4 deposition the other day?</p> <p>5 A. I was.</p> <p>6 Q. So you heard her testimony that she was 7 looking right at him, correct?</p> <p>8 A. I believe --</p> <p>9 MR. CAVALIER: Object to the 10 categorization and description.</p> <p>11 MR. CARSON: I'm describing my client's 12 testimony at her deposition.</p> <p>13 - - - (Indistinguishable cross-talk.)</p> <p>14 - - -</p> <p>15 THE WITNESS: -- where Gregg's hand was.</p> <p>16 BY MR. CARSON:</p> <p>17 Q. So you've heard Lisa swear under oath that 18 she watched him pull Patricia onto his lap, correct?</p> <p>19 MR. CAVALIER: Object to form.</p> <p>20 THE COURT REPORTER: What was the answer?</p> <p>21 THE WITNESS: Yes.</p> <p>22 BY MR. CARSON:</p> <p>23 Q. You heard him, right? You heard her</p>	Page 207
<p>1 - - -</p> <p>2 Q. There's never been a single inconsistency, 3 has there?</p> <p>4 A. I've just pointed out two inconsist -- 5 three inconsistencies.</p> <p>6 Q. How? What are they?</p> <p>7 MR. CAVALIER: Objection. Asked and 8 answered.</p> <p>9 THE WITNESS: First one was that he was 10 just too close; second one was that he pulled 11 her onto his lap; third one was he put his hand 12 under her as well as the first two.</p> <p>13 BY MR. CARSON:</p> <p>14 Q. So according to you, because of those, it 15 never happened, right?</p> <p>16 A. I didn't say that. I said her testimony 17 is not credible with me because she has changed her 18 testimony over time.</p> <p>19 Q. You don't like -- strike that. You 20 weren't there, were you?</p> <p>21 A. No, I wasn't.</p> <p>22 Q. So you don't know whether this happened, 23 do you?</p> <p>24 A. I have no idea what happened.</p> <p>Q. Did Lisa corroborate it?</p>	Page 206	<p>1 testify to that, correct?</p> <p>2 A. Yup.</p> <p>3 Q. She also corroborated to you at the time, 4 right, back in November?</p> <p>5 A. Who?</p> <p>6 Q. Lisa.</p> <p>7 A. I don't remember. Show me.</p> <p>8 Q. Well, wouldn't she have been a witness 9 that you could've talked to about this incident?</p> <p>10 A. I spoke to Tricia about Tricia, Lisa about 11 Lisa, and Marnie about Marnie.</p> <p>12 Q. So you didn't care about talking about -- 13 getting witness statements?</p> <p>14 MR. CAVALIER: Object to form.</p> <p>15 THE WITNESS: I asked --</p> <p>16 BY MR. CARSON:</p> <p>17 Q. Did you care about getting witness 18 statements?</p> <p>19 MR. CAVALIER: Seth, listen. You're not 20 on television. You're not in front of a jury. 21 If you wanna ask questions, let him answer the 22 questions.</p> <p>23 BY MR. CARSON:</p> <p>24 Q. Did you care about getting witness</p>	Page 208

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1	<p>---</p> <p>statements?</p> <p>2 A. I got witness statements.</p> <p>3 Q. I thought you just said you talked to --</p> <p>4 ---</p> <p>5 (Indistinguishable cross-talk.)</p> <p>6 ---</p> <p>7 THE COURT REPORTER: Guys, just so you</p> <p>8 know, every time there's an interruption, it's</p> <p>9 gonna be a very unclear record.</p> <p>10 MR. CAVALIER: I mean, this whole</p> <p>11 thing's --</p> <p>12 THE WITNESS: I cared about witness</p> <p>13 statements, and I collected witness statements.</p> <p>14 I did not ask each about the other. I asked</p> <p>15 each about herself and herself alone, and it</p> <p>16 wasn't just the sexual topic; it was the whole</p> <p>17 range of displeasure with Gregg's behavior as a</p> <p>18 manager, and I took this all in, I took notes</p> <p>19 on it, which I may or may not have, and I --</p> <p>20 BY MR. CARSON:</p> <p>21 Q. You gotta speak up.</p> <p>22 A. I investigated it, and I mitigated it, and</p> <p>23 everybody was satisfied with it. So why are we</p> <p>24 talking about it now?</p>	<p>1 them up.</p> <p>2 Q. So you --</p> <p>3 A. Let me finish. I didn't inquire. I took</p> <p>4 it at face value that these were text messages that</p> <p>5 she sent at that time, in that place, made no</p> <p>6 inquiry. I took all three of their statements at</p> <p>7 face value and took drastic, radical action to</p> <p>8 mediate their problems, and they were content with</p> <p>9 it. And I ask again, why are we here discussing</p> <p>10 this when everybody was happy with it, and nobody</p> <p>11 had a complaint after that? What grounds are there</p> <p>12 to be discontent? They said -- and look at this</p> <p>13 very note that you point out to me from Tricia that</p> <p>14 says that the least of my -- more or less, my main</p> <p>15 problem is not sexual harassment and sexual things.</p> <p>16 It's other things. Gregg's being a bad --</p> <p>17 ---</p> <p>18 (Indistinguishable cross-talk.)</p> <p>19 ---</p> <p>20 THE WITNESS: That was the gist of it.</p> <p>21 Yes, there was a sexual component. It was</p> <p>22 minor. It was put aside. Look at Stacey</p> <p>23 Roman's notes on the meeting on the 5th of</p> <p>24 November. It was all about this and that and</p>	<p>Page 212</p>
1	<p>---</p> <p>Q. So you didn't try to corroborate any of</p> <p>2 the allegations that any of these women made? Is</p> <p>3 that your testimony?</p> <p>4 A. I took their allegations at face value and</p> <p>5 acted upon them.</p> <p>6 Q. So trying to get to the bottom of it and</p> <p>7 find out if these things really happened wasn't</p> <p>8 really a concern of yours, was it?</p> <p>9 MR. CAVALIER: Object to form.</p> <p>10 THE WITNESS: I took their allegations at</p> <p>11 face value and did --</p> <p>12 BY MR. CARSON:</p> <p>13 Q. Don't you wanna know if Gregg did it?</p> <p>14 MR. CAVALIER: Seth, how many times you</p> <p>15 gonna interrupt the guy?</p> <p>16 MR. CARSON: He answered my question.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. Don't you wanna know if Gregg did it?</p> <p>19 A. I took at face value that he did it. I</p> <p>20 listened to them, and I acted upon it. I did not</p> <p>21 engage in a forensic investigation into it beyond</p> <p>22 that. I did not, for example, look at Lisa's text</p> <p>23 messages in context. I just looked at them on her</p> <p>24 phone, and she showed me. Now, she could've made</p>	<p>1 the other. Not a word about sexual --</p> <p>2 BY MR. CARSON:</p> <p>3 Q. I asked you a yes or no question.</p> <p>4 A. All right, and I can answer as I wish.</p> <p>5 Q. So -- but you can't just talk for five to</p> <p>6 ten minutes without --</p> <p>7 A. I believe I can, and I will do so if I</p> <p>8 want to.</p> <p>9 Q. Actually, you're not going to. So -- so</p> <p>10 Mr. Pipes, your -- the way you reacted to these</p> <p>11 allegations, you reacted as if all of them were</p> <p>12 true? Is that your testimony, yes or no?</p> <p>13 A. I reacted to them, yes.</p> <p>14 Q. So if Gregg Roman stuck his foot up Lisa's</p> <p>15 ass, and if Gregg Roman had sex with an 18-year-old</p> <p>16 intern and lured her to his room to get something</p> <p>17 signed in the course and scope of his position as</p> <p>18 director, and if Gregg Roman put his hand under</p> <p>19 Patricia's butt and dragged her onto his lap and</p> <p>20 started whispering inappropriate things in her ear,</p> <p>21 your response was to let him maintain his</p> <p>22 directorship?</p> <p>23 MR. CAVALIER: Object to form across the</p> <p>24 board.</p>	<p>Page 212</p>

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1	---	1	---
2	MR. CARSON: Your objection's noted.	2	hypothetical --
3	BY MR. CARSON:	3	BY MR. CARSON:
4	Q. You can answer.	4	Q. That's not your business?
5	A. Lea Merville is not at issue here.	5	MR. CAVALIER: You can answer if you can.
6	Q. Yeah, I know. She wasn't an issue for you ever, right?	6	THE WITNESS: If Lisa Barbounis goes to a member of the MEF staff and lures her to his --
7	A. No. She never came to me.	7	to her room for sex, it's also not my business.
8	Q. You never did anything about Lea -- the issues that dealt with -- that pertained to Lea Merville, correct?	8	Yeah, these are not my business.
9	A. I never did. She never came to me.	9	BY MR. CARSON:
10	Q. It never did --	10	Q. So you're comparing consensual sex -- Lisa
11	A. -- true and what's not true. I don't know what her views are. I don't know if she -- anything happened. I don't know if she want it to happen. I know nothing.	11	Barbounis' decision to have consensual sex with someone to quid pro quo sexual harassment? That's your --
12	Q. Could you have called her?	12	MR. CAVALIER: Object to form, and object to the mischaracterization of --
13	A. Not my business. I had three employees who were unhappy and put matters aforth [sic] -- without the sex part -- four employees who were unhappy, and I had to deal with it.	13	BY MR. CARSON:
14	Q. Did you just say it's not your business?	14	Q. Are you comparing those two things?
15	A. What relations Gregg has with others who don't protest to me, no, it's not my business.	15	A. No.
16		19	Q. Then why do you keep saying that,
17		20	Mr. Pipes? What does Lisa Barbounis' decision to have sex with someone have to do with anything in this case?
18		21	A. These are both actions -- sexual actions
19		22	that people doing on their own private time, and no
20		23	
21		24	
22			
23			
24			
	Page 214		Page 216
1	---	1	---
2	Q. So it only becomes your business if someone complains to you directly? Is that your testimony?	2	one has come to me to complain about it, and, therefore, it's not my business. I am --
3	MR. CAVALIER: Object to form.	3	Q. So you're only responsible --
4	THE WITNESS: There could be other conditions, but what we're talking about now is three employees who came to me with specific allegations, and I dealt with them.	4	A. Let me finish.
5		5	Q. You just --
6		6	A. Let me finish.
7		7	Q. Go ahead, Mr. Pipes. Finish your answer.
8		8	A. I am president of the Middle East Forum.
9		9	I am not their chaperones.
10	(Indistinguishable cross-talk.)	10	Q. You're not their den mother, right?
11		11	A. I'm not their den mother. Thank you. I
12	THE WITNESS: I have now, since then, engaged in lawsuits that seem to pretend that I didn't deal with them.	12	am not concerned unless someone comes to me -- I
13	BY MR. CARSON:	13	have a big job. I have to raise money. I have to engage in scholarship. I have to oversee the
14	Q. So if Gregg Roman entices a 18-year-old intern to a hotel room and says, you'll come to my hotel room if -- and I'll sign your document, that's not your business?	14	institution, and I do not go inquire of people, how are you feeling today? Any problems? No. They
15	MR. CAVALIER: Object to form. Object to lack of foundation --	15	come to me. I made it clear from the beginning. No surprises, open door, come to me. Any problems, come to me, and they came to me and --
16	BY MR. CARSON:	16	Q. If they don't come to you, it's not your business?
17	Q. That's not your business?	17	A. Right. What am I -- I don't delve into their private lives.
18	MR. CAVALIER: -- incomplete	18	Q. It's not your problem?
19		19	
20		20	
21		21	
22		22	
23		23	
24		24	

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<p>1           A. It's not --</p> <p>2           Q. Right?</p> <p>3           A. -- something I know about.</p> <p>4           Q. You're too important of a person?</p> <p>5           MR. CAVALIER: Object.</p> <p>6           THE WITNESS: I have a job. My job is to 7           pay close attention to my employees if they 8           have a problem.</p> <p>9           BY MR. CARSON:</p> <p>10          Q. Whose job it is [sic] to make sure that 11        Gregg Roman doesn't violate the rights of women who 12        work for the Middle East Forum? Isn't that your 13        job, too, Mr. Pipes?</p> <p>14          A. My job is to be concerned with the welfare 15        of my employees, whatever gender they may be and 16        whatever their issues may be, and I take concern. I 17        think you have Exhibit A in front of you. When I 18        was presented with a problem, I dealt with it 19        expeditiously and successfully. The issue was 20        closed until certain people wandered in and raised 21        it and asked for \$31 million.</p> <p>22          Q. You would characterize the way you handled 23        this as successful?</p> <p>24          A. I certainly would.</p>	<p>1           Q. Did you think these situations warranted a 2           personal response?</p> <p>3           A. Yes.</p> <p>4           Q. So why did you send them the exact same 5           email? You sent Marnie the same email, too. Why?</p> <p>6           A. Because I wanted to have a single 7           arrangement with everyone, and everyone was content 8           with it. There were no special circumstances for 9           one or the other person.</p> <p>10          Q. Shouldn't there have been special 11        circumstances since each one of them was alleging 12        special conduct -- different conduct?</p> <p>13          A. No.</p> <p>14          Q. No, okay. So Ms. Barbounis tells you that 15        she's not at all happy with Mr. Roman's response to 16        the allegations, correct?</p> <p>17          A. I have to read it. I note his 18        inappropriate behavior is the least of my concerns. 19        More troubling is the deceit and abusive behavior I 20        witness and experience on a weekly basis, which 21        increased after the Israel incident. And this is, 22        rather, what Tricia said -- least of her concerns, 23        that this was a minor matter -- and then they go on 24        about all the bad things that Gregg did as a</p>	
	Page 218	Page 220
<p>1           Q. Sitting here today?</p> <p>2           A. Yes, very successful. I have --</p> <p>3           Q. I applaud your honesty.</p> <p>4           A. -- four written -- signed documents 5        saying, go ahead, I'm content. You have them right 6        here in front of you. They all signed --</p> <p>7           Q. Mr. Pipes, I'm gonna direct your attention 8        to another exhibit. It's marked 0005 to 6. Let's 9        just take it up to 7. All right. And, again, see 10        this email? It's the exact same email you sent to 11        Patricia McNulty?</p> <p>12          A. Yup.</p> <p>13          Q. You didn't draft a separate email for her. 14        You sent the same -- you didn't draft a separate 15        email for Lisa. You sent her the same email you 16        sent Ms. McNulty, correct?</p> <p>17          A. Correct.</p> <p>18          Q. And you sent it the exact same time, 19        correct?</p> <p>20          A. Yep.</p> <p>21          Q. You didn't think these situations 22        warranted a personal response?</p> <p>23          MR. CAVALIER: Object to form.</p> <p>24          BY MR. CARSON:</p>	<p>1           manager. Right, understood. That's what I heard 2        loud and clear.</p> <p>3           Q. So, Mr. Pipes, you decided to interpret 4        that sentence as minimizing the sexual misconduct 5        and not outlining the seriousness of the deceit and 6        the abusive behavior?</p> <p>7           MR. CAVALIER: Object to form.</p> <p>8           BY MR. CARSON:</p> <p>9           Q. Why? Why did you decide to interpret it 10        that way?</p> <p>11          A. I'm reading her words. His, quote, 12        "inappropriate behavior," unquote, is the least of 13        my concern.</p> <p>14          Q. Compared to the deceit and the abusive 15        behavior, she said.</p> <p>16          A. Least of my concern. Least of my concern. 17        That was not her major issue. Tricia said roughly 18        the same thing. Marnie, I believe, said roughly the 19        same thing. All our discussions --</p> <p>20          Q. Mr. Pipes --</p> <p>21          A. Let me finish.</p> <p>22          Q. Right. You're gonna answer the 23        question --</p> <p>24          A. Let me finish.</p>	

	Page 221	Page 223
1	---	1 you're answering right now? You don't even know
2	---	2 what you're answering.
3	(Indistinguishable cross-talk.)	3 MR. CAVALIER: Seth, this is gonna take a
4	---	4 long time, and you're gonna have a really
5	THE COURT REPORTER: Okay. Guys, this is	5 jumbled record if you don't let him answer the
6	my last time, okay? From here on out, it's	6 question --
7	gonna be whatever comes out, comes out.	7 MR. CARSON: I strike my last question.
8	MR. CAVALIER: I'm amazed you've managed	8 I'm moving on.
9	to go this long, Grace.	9 MR. CAVALIER: If you want different
10	THE COURT REPORTER: Me, too.	10 answers, ask different questions. Otherwise,
11	---	11 let him --
12	(Indistinguishable cross-talk.)	12 MR. CARSON: -- yes or no question. Every
13	---	13 time I ask a question, your client decides he's
14	THE WITNESS: -- I get to talk and then	14 gonna go off on a speech about god knows what.
15	you wait till --	15 So we're gonna get a clear record, and we're
16	MR. CARSON: You have to answer the	16 gonna focus on the questions that I'm asking.
17	questions I ask.	17 MR. CAVALIER: Clear record went out the
18	THE WITNESS: No, I don't.	18 window long ago.
19	MR. CAVALIER: He is answering the	19 BY MR. CARSON:
20	questions.	20 Q. So, anyway, Mr. Pipes, why do you not
21	MR. CARSON: You actually do, Mr. Pipes.	21 highlight the deceit and the abusive behavior? Why
22	I ask the questions. You answer the questions	22 are you attributing that to his management style?
23	I ask.	23 It doesn't say anything about that in this email,
24	MR. CAVALIER: He's allowed to give his	24 does it?
	complete answer, Seth. You know that.	Page 224
	Page 222	Page 224
1	---	---
2	MR. CARSON: Can't answer whatever	1 A. I'm gonna resume where I was interrupted.
3	question that you wish I asked.	2 Q. Mr. Pipes, forget about the last question.
4	MR. CAVALIER: He's allowed to expound on	3 I'll withdraw it. More troubling is the deceit and
5	his answer. You don't have the right to demand	4 the abusive behavior, it says.
6	a yes or no from him. If he feels the complete	5 A. I'm gonna resume my prior answer.
7	answer needs to explain, then he can explain	6 Q. You don't have to. It's not --
8	it. He took an oath to tell the whole truth.	7 A. I'm going to.
9	BY MR. CARSON:	8 Q. I withdrew the question. There's no
10	Q. So my next question is this.	9 question pending.
11	A. I am not gonna deal with your next	10 A. I wanna finish what I was saying.
12	question. I'm gonna deal with what I was saying.	11 Q. You just wanna go off on a speech?
13	Q. Do you know what you were saying?	12 MR. CARSON: We're gonna go off the
14	A. Yes, I know what I was saying.	13 record, then, if he's gonna just go off on a
15	Q. Go ahead. Finish.	14 speech. There's no question, Jon.
16	A. Lisa said here in words I'll, again,	15 MR. CAVALIER: Daniel, let him ask the
17	quote, his inappropriate behavior is the least of my	16 next question. If he's withdrawing the prior
18	concern. Tricia said something similar. Marnie	17 question, there's no point in finishing your
19	said something similar. The emphasis of all three	18 answer. He can withdraw the question if he
20	was -- and Matt as well -- was on his being a bad	19 wants to.
21	manager. Deceit, abuse, manipulation, and so forth.	20 BY MR. CARSON:
22	Yes, they had a lot of complaints about him.	21 Q. "More troubling is the deceit and the
23	Q. Why do you --	22 abusive behavior." What does that have to do with
24	A. Let me finish.	23 management style?
	Q. Mr. Pipes, do you know what question	24 A. That was her complaint about his

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	<p style="text-align: center;">---</p> <p>1 management.</p> <p>2 Q. Where does it say that?</p> <p>3 A. That's what it's about.</p> <p>4 Q. Why? Where does it say it?</p> <p>5 A. She was working with him, and she found</p> <p>6 his management to be deceitful, abusive, and much</p> <p>7 else. She had a long list of complaints, and others</p> <p>8 have other complaints, and this is what you will --</p> <p>9 if you look at my letter to Gregg, I dealt with it.</p> <p>10 I dealt with all the problems in his being the</p> <p>11 supervisor of all these personnel. He did a bad</p> <p>12 job.</p> <p>13 Q. Does she say that she's talking about his</p> <p>14 management style?</p> <p>15 A. Let me finish. He has many virtues, he</p> <p>16 has many skills, but he was a bad manager, and I</p> <p>17 didn't argue with them. I accepted that he was --</p> <p>18 Q. Okay. Thank you, Mr. Pipes.</p> <p>19 A. Let me finish.</p> <p>20 Q. Mr. Pipes, you're not just gonna go off on</p> <p>21 a speech. I didn't ask anything about his</p> <p>22 management style. My question was, where does it</p> <p>23 say in here that she's talking about his management</p> <p>24 style? You're not gonna go off on a speech every</p>	<p style="text-align: center;">---</p> <p>1 Q. Where?</p> <p>2 A. "More troubling is the deceit and abusive</p> <p>3 behavior I witnessed and experienced on a weekly</p> <p>4 basis, which increased after the Israel incident."</p> <p>5 Q. Why do you think that's about his</p> <p>6 management style?</p> <p>7 A. Because he was her manager.</p> <p>8 Q. Couldn't she have been talking about</p> <p>9 sexual misconduct when she said that?</p> <p>10 A. No. She just said that sexual misconduct,</p> <p>11 which she referred to as "inappropriate behavior,"</p> <p>12 was the least of her concerns. No. She was</p> <p>13 concerned with him as a manager, as was Tricia, as</p> <p>14 was Marnie, as was Matt, and as was I.</p> <p>15 Q. That's how you interpreted this letter?</p> <p>16 A. That's how I interpreted this letter.</p> <p>17 Q. Did you ever ask Lisa what she meant by</p> <p>18 it?</p> <p>19 A. We had long discussion. This is a summary</p> <p>20 of our long discussion.</p> <p>21 Q. Did you have a discussion after she</p> <p>22 sent --</p> <p>23 A. Don't interrupt me. And our long</p> <p>24 discussion was about her many grievances with Gregg</p>	Page 227
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	<p style="text-align: center;">---</p> <p>1 time I ask a question, all right? You have to</p> <p>2 answer the questions I ask.</p> <p>3 A. -- the rules of a deposition and what I'm</p> <p>4 allowed --</p> <p>5 MR. CARSON: Jon, can you please explain</p> <p>6 to your client that he has to answer --</p> <p>7 MR. CAVALIER: Seth, if you ask him</p> <p>8 open-ended --</p> <p>9 MR. CARSON: It wasn't an open-ended</p> <p>10 question. Jon, I said, where does it say in</p> <p>11 this email that he's talking about management</p> <p>12 style?</p> <p>13 MR. CAVALIER: He's trying to --</p> <p>14 MR. CARSON: It's a yes or no question.</p> <p>15 He points out the answer as pointing out</p> <p>16 something in the email that he's referencing.</p> <p>17 THE WITNESS: "Where" is not a yes or no</p> <p>18 question.</p> <p>19 MR. CAVALIER: He's trying to explain to</p> <p>20 you where he learned the information.</p> <p>21 BY MR. CARSON:</p> <p>22 Q. Does it say in this email that she's</p> <p>23 talking about his management style, yes or no?</p> <p>24 A. Yes.</p>	<p style="text-align: center;">---</p> <p>1 as a manager.</p> <p>2 Q. When was that discussion?</p> <p>3 A. November 1st.</p> <p>4 Q. So this email was sent on November 4th, so</p> <p>5 did you ever have a discussion with her about this</p> <p>6 email?</p> <p>7 A. I don't think so. I don't remember.</p> <p>8 Q. You never followed up with her to talk to</p> <p>9 her about the deceit and the abuse?</p> <p>10 MR. CAVALIER: Object to form.</p> <p>11 THE WITNESS: I dealt with this by</p> <p>12 removing him from her -- being her manager. I</p> <p>13 did what she wanted. I took Gregg out of her,</p> <p>14 Tricia's, and Marnie's lives, and, to some</p> <p>15 extent, Matt's as well.</p> <p>16 Q. Did you deal with the comment that if Lisa</p> <p>17 crosses Gregg, he's gonna slit her throat?</p> <p>18 A. She told me about this, and she also told</p> <p>19 me that she threatened to slit him, slit his throat</p> <p>20 if he didn't behave. So, yeah, this is the way she</p> <p>21 talks.</p> <p>22 Q. But she's not the one who said that.</p> <p>23 Gregg said that, according to her, right?</p> <p>24 A. Gregg talks that way, too.</p>	Page 228

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1	Q. That's how Gregg talks, right? He 2 threatens to slit people's throats? 3 A. I am not -- 4 MR. CAVALIER: Object to form. 5 THE WITNESS: -- other than this one or 6 this. I don't know about this, but the point 7 is that this is a summary of what our 8 discussions have been, and we moved on. 9 BY MR. CARSON: 10 Q. She -- 11 A. -- put down on the record her -- her 12 complaints, her problems, and she agreed at the end 13 of it to the arrangement I had suggested, and we all 14 moved on, and there was no more discussion of this. 15 Zero. We -- 16 Q. Do you agree with Gregg -- 17 A. Let me finish. We addressed it intensely 18 for a week, and then we moved on and never discussed 19 it again, except with the minor exception of 20 March 9th when we alluded to it, and everybody said, 21 no problem. Otherwise, it never came up until your 22 concocted lawsuits. 23 Q. Yeah. You said that about 30 times today. 24 On November 5th, 2018, you had a meeting, correct?	1	which this is only one. 2 Q. Do you believe those things? 3 MR. CAVALIER: Object to form. 4 THE WITNESS: He did acknowledge that he 5 said nasty things about me, yeah. And, 6 therefore, I'll add I put him on probation and 7 said, any serious mistakes you make, you're 8 gone. And I also, I might add, looked for 9 someone to replace him right there in November. 10 BY MR. CARSON: 11 Q. And while he was on probation, he never 12 once -- you never once got any complaints about him, 13 right? 14 A. Correct. I remember -- 15 Q. Sure. 16 A. So, yes, he made lots of mistakes before 17 November 1st. 18 Q. You're not in focus. 19 A. Lots of mistakes. And, at the same time, 20 he's very skilled, so I said, stop making the 21 mistakes. I'll limit -- I'll reduce your 22 remuneration. I'll take away all these perks and 23 benefits you have. Show me what you can do, that 24 you are -- continue to be skilled and behave
1	Page 230 - - - A. On which date? Q. On November 5th, 2018, you had a meeting? A. Yes. Q. Right, and then after that you moved on; is that right? A. Yeah. Within a few days. Q. Can't hear you. A. Within a few days, yes. I mean, I asked the project directors as well. Q. Take a minute and read the rest of the paragraph. A. Which one? Q. This one, and you can read the one below, too. Let me know when you want me to move down. Well, I can ask, do you agree with Gregg that MEF is better without you? MR. CAVALIER: Object to form. BY MR. CARSON: Q. Says here that Gregg claims MEF is better without you. Do you agree with that, Mr. Pipes? A. No, I don't. Q. Do you ever talk to Gregg about that? A. I raised with him, in general, the nasty things that I was told that he said about me, of	1	yourself and not do this again, and he did. Q. Did you ever take away any perks or benefits from Gregg Roman? A. Yes, lots. You have a letter. Q. Which ones did you take away? A. You have the letter. You showed me the letter -- Q. He didn't lose any money, right? You didn't take away his salary? A. He did. He lost something in the order of \$27,000. Q. How much? A. \$27,000. Q. How did he lose \$27,000? A. The medical insurance I took away. Q. You took it away from everyone because you said it's not your policy to do that, right? A. No. I didn't take away from -- it all from anyone, and I only took it all away from him. Q. Gregg Roman bought that policy for the office without your permission, correct? A. Correct. Q. Right? A. Right.

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1	---	1	---
2	Q. You didn't want him to do that. He went	2	Q. Well, could Gregg Roman do anything that
3	rogue and did it on his own, right?	3	could lead to his termination? Is there anything --
4	A. Right, so I punished him by taking the --	4	is there way you would ever consider firing him?
5	Q. Right. Had nothing to do with the sexual	5	MR. CAVALIER: Same objection.
6	harassment, right?	6	THE WITNESS: I -- you saw the letter to
7	A. No. The sexual harassment meant that he	7	him, and I said, if there's anything along
8	was excluded from the office. Other problems --	8	these lines, you will be fired immediately.
9	spending money --	9	BY MR. CARSON:
10	Q. You keep going out of focus, Mr. Pipes,	10	Q. Well, today we know there is something
11	something about your green screen effect. We need a	11	along those lines, correct?
12	clear record of the video for the courtroom, so you	12	MR. CAVALIER: Object to form.
13	gotta like move your chair up or something like	13	THE WITNESS: Post November. If there's
14	that. Yeah, there you go.	14	anything post November 5th, 6th, he would be
15	---	15	fired. He did not --
16	(Indistinguishable cross-talk.)	16	---
17	---	17	(Indistinguishable cross-talk.)
18	BY MR. CARSON:	18	---
19	Q. Did you talk to Thelma Prosser about what	19	THE WITNESS: Nobody complained, and
20	she meant when she said that Gregg was borderline	20	therefore he --
21	unbearable?	21	BY MR. CARSON:
22	MR. CAVALIER: Object to form.	22	Q. You gotta speak up.
23	THE WITNESS: I went around and talked to	23	A. Nobody complained after November 5th or so
24	everyone about everything that was on their	24	and --
	Minds November 1st. Whether I went back to		Q. Alana Goodman.
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1	---	1	---
2	them again, I don't think so. Whether she	2	A. Alana Goodman did not complain to me.
3	mentioned that on November 1st, I can't	3	Q. So you can pick up the phone and call her
4	remember, but I got a complete download of all	4	and find out if Gregg is using his position as the
5	these many, many complaints about Gregg, which	5	director of the Middle East Forum to try to force
6	were generally quite consistent that he was	6	reporters to have sex with him, right?
7	doing lots of things wrong as director of the	7	MR. CAVALIER: Object to -- oh, he's gonna
8	Middle East Forum, and I excluded him from the	8	call everybody in the world just to ask
9	office for the sake of getting him out of the	9	about --
10	women's hair so there wouldn't be any	10	---
11	allegations and so forth, protect him as well	11	(Indistinguishable cross-talk.)
12	as them. And, on the other hand, I took away	12	---
13	all sorts of perks and powers because of his	13	MR. CARSON: -- complain that Gregg Roman
14	mistakes as director. So I addressed both	14	is trying -- yelling at them across a bar to go
15	issues simultaneously and, as you know, got	15	to his hotel room in 30 minutes or he's gonna
16	the --	16	give the story to somebody else.
17	BY MR. CARSON:	17	BY MR. CARSON:
18	Q. Gotta speak up.	18	Q. How about just call those people,
19	A. As you know, I got the agreement of the	19	Mr. Pipes? Did you ever consider that?
20	principals involved.	20	MR. CAVALIER: Object to form. Object to
21	Q. What would it take to fire Gregg Roman?	21	foundation. Object to the hypothetical.
22	MR. CAVALIER: Object to form. Object to	22	BY MR. CARSON:
23	the incomplete hypothetical.	23	Q. You know about it now. You just listened
24	THE WITNESS: Hypothetical.	24	to the recording. Have you ever considered it?
	BY MR. CARSON:		What do you consider --

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1	A. I heard a recording. I don't know its	1	THE WITNESS: Yes.
2	providence. I don't know if it's a paid actress. I	2	BY MR. CARSON:
3	don't know anything about it.	3	Q. You really think that?
4	Q. Do you know who Alana Goodman is?	4	A. I handled these objections -- I handled
5	A. I told you I --	5	these complaints expeditiously and satisfactorily.
6	Q. Is she an actress?	6	I can't imagine why anyone would not be -- would not
7	MR. CAVALIER: Object to the form.	7	come away from this pleased with what I did since
8	THE WITNESS: I don't know if she's an	8	the principals were pleased with what I did.
9	actress or not, but I don't know who was	9	Q. Do you think they're still pleased today?
10	speaking there. I know nothing about this. If	10	A. Well, you got your hands on them, and you
11	Alana Goodman wants to complain about something	11	got them to ask for \$31 million. Of course not.
12	that happened some years ago, let her come to	12	---
13	me. I am not in the business of investigating	13	(Indistinguishable cross-talk.)
14	my employee's personal life.	14	---
15	BY MR. CARSON:	15	THE WITNESS: They were content. They
16	Q. Yeah. You're not in the business of	16	wrote -- they signed agreements that this was
17	making your workplace safe for the female employees,	17	fine.
18	correct?	18	BY MR. CARSON:
19	MR. CAVALIER: Object to form. Object to	19	Q. You think I called them to sign them up
20	argumentative. You don't have to answer that,	20	for their cases? That's how you think it works?
21	Daniel.	21	A. I don't know what happened. \$31 million
22	MR. CARSON: Yeah, he does.	22	will certainly influence a lot of people's memories,
23	BY MR. CARSON:	23	including yours. How much are you getting, 14
24	Q. Are you in the business of making your	24	million out of it, 13 million? Good amount, Mr. --
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1	workplace safe for the female employees who work	1	---
2	there?	2	Q. Mr. Pipes, if you wanna pay me 14 million,
3	MR. CAVALIER: Again, same objection. You	3	that's fine, but I can assure you I will never get
4	can answer it if you want to, Daniel, but you	4	\$14 million out of this case or anything --
5	don't have to. It's argumentative.	5	A. We can agree on that, Mr. Carson. You're
6	BY MR. CARSON:	6	not gonna get --
7	Q. No. You do have to.	7	Q. I think we can. Off the record I can tell
8	A. I'm in the business of making the	8	you what I really think about that, but, anyway,
9	workplace safe for all the employees, and, indeed,	9	let's keep going. So one of the things that Lisa
10	we have gone to great lengths to make the workplace	10	writes in this email to you is that she would be
11	safe. As you've heard, we have all sorts of	11	willing to participate in any investigation of Gregg
12	safeguards in place to protect everyone from	12	Roman, correct?
13	dangers. Yes, it's a very high priority for me, and	13	A. Where?
14	we have done so. And, indeed, in this case --	14	Q. Just take a minute and read. Do you see
15	Q. You gotta speak up.	15	what I highlighted there?
16	A. Where there was an allegation -- where	16	MR. CAVALIER: Seth, I'd ask, if you're
17	there were allegations against Gregg, I dealt with	17	gonna ask about a sentence referencing
18	them immediately and radically until the	18	mentioned instances, that you position the
19	satisfaction of those who complained.	19	document so that we can see the aforementioned
20	Q. You think a female employee would feel	20	instances.
21	comfortable reporting sexual harassment today after	21	MR. CARSON: We just read the rest of the
22	the way you've handled the last ten reports?	22	document. I just got done scrolling down.
23	MR. CAVALIER: Object to the incomplete	23	It's the same email we're talking about the
24	hypothetical. You can answer.	24	last hour.
			MR. CAVALIER: If you're gonna ask him

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1	----- questions about it, he should be able to see 2 it, right? 3 BY MR. CARSON: 4 Q. -- need me to scroll back up, let me know, 5 but I'm also talking about this. It says, "I am 6 satisfied with the speed of the inquiry yet 7 disappointed in the discovery aspect of the 8 incident. I will, as requested, submit a separate 9 detailed description of the events that occurred on 10 March 14 in addition to all corroborating evidence." 11 So she does tell you that she's willing to continue 12 to help you corroborate the allegations made, right? 13 It's what she said. It's what the document says. 14 A. Yeah. 15 Q. But there was no investigation done after 16 this letter was sent, correct? 17 MR. CAVALIER: Object to form. 18 BY MR. CARSON: 19 Q. Did you investigate anything after this 20 letter? Remember, it's dated November 4th. 21 A. The issue was closed. 22 Q. The issue was closed. That's right. 23 Okay. We can move on to the next exhibit. Where 24 are we? All right. So, just to round it out, I	1 A. I agree. I see it, yes. 2 Q. Okay. And you sent them all at 11:34. 3 This one says 11:34, too, and that's a.m., correct? 4 A. It's a.m., yup. 5 Q. Okay. And then Marnie responds, right, 6 and she's worried about Gregg having access to 7 emails and passwords. Do you see that? 8 A. Yep. 9 Q. And then, down here -- this is part of the 10 same exhibit -- it's a memorandum. Now, I think 11 that this is a memorandum that you sent to the 12 entire office. This looks like one of those things 13 where you have like a group email. Is that what 14 this is? 15 A. Yep. 16 Q. Can you speak up, please, Mr. Pipes? 17 A. Yes, yes. 18 Q. And this email is -- looks like it was 19 sent on November 4th and -- "I am again addressing 20 this memo to everyone who works at MEF," and, 21 basically, you're announcing the staff meeting that 22 occurred on November 5th, 2018, right? 23 A. Yes. 24 Q. And Gregg Roman was initially invited to	-----
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1	----- won't spend a lot of time on it because I'm sure 2 you'll get questions on it from another lawyer at 3 some point. So exhibit number -- I don't know what 4 number we're on. 5 THE VIDEOGRAPHER: Sorry, counsel. We 6 are -- I'm at Pipes-8. So we just finished 7 Pipes-7, which were pages five through seven of 8 the large Bates-marked document. 9 MR. CARSON: All right. So 11 -- the next 10 one will be 11 -- 11 through 15, I guess. 11 THE VIDEOGRAPHER: All right. Thank you. 12 And we'll mark it as Pipes-8 for exhibition. 13 BY MR. CARSON: 14 Q. All right. So this is an email. This is 15 the same email that we already looked at for the 16 other two women. He sent it at 11:34 where you talk 17 about the investigation you did yesterday. Do you 18 recall that? 19 A. I don't recall it, but I see it. 20 Q. I'm sorry? 21 A. I don't recall it, but I see it. 22 Q. Wait. What don't -- you don't recall -- 23 remember we talked -- you sent this one to Lisa and 24 Tricia, too?	1 that meeting, correct? 2 A. Correct. 3 Q. And then you disinvited him when you 4 realized it would make the women uncomfortable? 5 MR. CAVALIER: Object to form. 6 THE COURT REPORTER: I can't hear you, Mr. 7 Pipes. 8 THE WITNESS: Legal privilege. 9 THE COURT REPORTER: What was that? 10 THE WITNESS: Legal privilege. 11 MR. CAVALIER: You're saying the reason 12 that you disinvited Gregg Roman has to do with 13 legal, so we're gonna object to that and not 14 answer the question under -- 15 BY MR. CARSON: 16 Q. No. I think what you're trying to say is 17 Marc told you, but I'm not asking what Marc told 18 you. I'm asking, why did you decide not to -- if 19 the only answer is that you're following the advice 20 of counsel, I guess you don't have to answer, but 21 I'll ask this for the record: Why did you tell 22 Gregg not to come to the meeting? 23 MR. CAVALIER: We're gonna assert to 24 privilege to that, Seth.	-----

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	<p style="text-align: center;">---</p> <p>1       MR. CARSON: Well, he has to decide 2       whether that's true.</p> <p>3       THE WITNESS: Yeah, legal privilege.</p> <p>4 BY MR. CARSON:</p> <p>5       Q. Did you think it was appropriate to invite 6       him in the first place?</p> <p>7       A. Legal privilege.</p> <p>8       Q. That's not legally privileged. I'm not 9       asking about any communication between you and 10       counsel.</p> <p>11       A. Yeah, it was.</p> <p>12       Q. Well, it was appropriate?</p> <p>13       A. This was -- these decisions to invite him 14       and then not to invite him --</p> <p>15       Q. We can't hear you, Mr. Pipes.</p> <p>16       A. The decisions to invite him and then not 17       to invite him were based on conversations with Marc 18       Fink.</p> <p>19       Q. I'm asking in your opinion. You're the 20       director of the Middle East Forum. It's your job to 21       enforce MEF policy, especially their 22       anti-discrimination policy. So I'm asking, based on 23       that, do you think it's appropriate to make the 24       women who are accusing someone of sexual harassment</p>	<p style="text-align: center;">---</p> <p>1       can move on.</p> <p>2       MR. CAVALIER: Okay.</p> <p>3       THE WITNESS: Give me a moment. Give me a 4       moment.</p> <p>5 BY MR. CARSON:</p> <p>6       Q. Go ahead.</p> <p>7       A. I initially invited him -- go back to that 8       memo. The key section here was, "I am sending you a 9       new NDA," and I included Gregg because I wanted him 10       to sign the NDA. I actually never had any intention 11       of his appearing, but I did want to get his NDA, 12       and, therefore, I made it seem to him that he was 13       coming so it made it more likely he would sign it, 14       but I had no intention of his being there.</p> <p>15       Q. Wasn't it already signed?</p> <p>16       A. No. There wasn't clear that -- no, didn't 17       happen.</p> <p>18       Q. Didn't you send an email to everyone 19       saying he's no longer coming anymore?</p> <p>20       A. Yes, subsequently, when he did sign it.</p> <p>21       Q. Mr. Pipes, I'm gonna move on. The -- the 22       next exhibit I'll show you is -- so, I guess, since 23       you brought up the NDA, I'll just -- why did you 24       want everyone to sign an NDA before the</p>	
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	<p style="text-align: center;">---</p> <p>1       face the harasser directly?</p> <p>2       MR. CAVALIER: Object to form.</p> <p>3       THE WITNESS: He wasn't there, so it's a 4       hypothetical question.</p> <p>5 BY MR. CARSON:</p> <p>6       Q. I think your actions speak for themselves, 7       so I'll move on.</p> <p>8       A. Well, let me think.</p> <p>9       Q. You can answer.</p> <p>10       A. All right. I guess I'll tell you.</p> <p>11       MR. CARSON: Jon, you wanna jump in?</p> <p>12       MR. CAVALIER: If you want to answer -- 13       there's no question pending, Daniel, but --</p> <p>14       THE WITNESS: Well, I didn't answer 15       before.</p> <p>16       MR. CARSON: I just wanna be fair to you.</p> <p>17       THE WITNESS: And I did command privilege, 18       but --</p> <p>19       MR. CAVALIER: Just -- just so -- you 20       can't talk about anything substantive that you 21       talked about with Marc.</p> <p>22       MR. CARSON: Yeah. I can move on --</p> <p>23       MR. CAVALIER: -- want to. You still can.</p> <p>24       MR. CARSON: This is not a big deal. We</p>	<p style="text-align: center;">---</p> <p>1       November 5th, 2018 meeting?</p> <p>2       MR. CAVALIER: To the extent you can 3       answer that question without talking about 4       legal advice, you can answer it. If you need 5       to rely on legal advice to answer the question, 6       we're gonna assert to privilege.</p> <p>7       THE WITNESS: I believe we had NDAs from 8       everyone but -- but Gregg, so --</p> <p>9 BY MR. CARSON:</p> <p>10       Q. Where did you --</p> <p>11       A. I sent it to everyone to de-emphasize the 12       fact that, actually, the only person we really cared 13       about was Gregg.</p> <p>14       Q. But, like, I guess my question is, I would 15       be concerned about the chilling effect that an NDA 16       might have on future reports. Did you consider that 17       at all?</p> <p>18       A. No.</p> <p>19       Q. There were some new stipulations in that 20       NDA, right?</p> <p>21       A. Yes.</p> <p>22       Q. Do you know what they were off the top of 23       your head?</p> <p>24       A. No.</p>	

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	<p style="text-align: center;">---</p> <p>1 Q. Do you know what you guys were talking 2 about in this here? I think it's trying to figure 3 out -- I'll bring your attention to this. 4 A. Self-explanatory, no? 5 Q. Well, it says, "Marnie, Marc, and I have 6 been working on this." Do you know what "this" is 7 when you guys -- what "this" is there? 8 A. Well, it says the letter to GR, new terms 9 of employment. 10 Q. So that was like trying to figure out what 11 his terms of employment would be post November 5th, 12 2018? 13 A. And I discussed it with various people, 14 including -- 15 Q. No. It wasn't a real question that time. 16 I just didn't know. Thank you, though. 17 A. Marnie was part of the discussion. 18 Q. All right. So I'll wait to do that. Did 19 you ever take Gregg Roman's key away from him? 20 A. Personally, no, but someone did. 21 Q. How does that work? Like is there 22 actually -- like I don't have a key to my office. I 23 have like a card that gets me in everywhere. Do you 24 have cards, or do you have like a physical key that</p>	<p style="text-align: center;">---</p> <p>1 Q. Do you know for a fact that Gregg ever 2 lost his key and his card? Strike that. Do you 3 know for a fact that Gregg Roman's key and card were 4 actually physically taken away from him? 5 A. Yes. 6 Q. How do you know that? 7 A. He -- I was told that -- I asked for it to 8 be handed in, and it was handed in. 9 Q. Marnie Meyer told you that? 10 A. I can't be specific. It's two years ago. 11 I know, to my satisfaction, his key was removed, and 12 when he did come to the office to take away his 13 personal effects, I was there, went downstairs and 14 let him in, and watched as he packed up and took his 15 stuff out. 16 Q. All right. So I guess I will show it to 17 you. So the next document is 17. It's right here. 18 We're on it now. So 17 and, I guess, 18 will be a 19 document, and this document is dated March 11th, and 20 it's from Tricia McNulty. So you testified earlier 21 that Ms. McNulty was happy to have Gregg come back; 22 is that correct? 23 A. Correct. 24 Q. Did Ms. McNulty or Ms. Barbounis or anyone</p>	Page 251
	<p style="text-align: center;">Page 250</p> <p>1 you took from him? 2 A. Card. Card was taken from him. 3 Q. So was Gregg Roman's privileges to come to 4 the office like physically taken away, as in, if he 5 wanted to come, he wouldn't have been able to 6 because he didn't have a key or card anymore; is 7 that right? 8 A. Yes. 9 Q. Yeah? 10 A. Yes. 11 Q. When did that happen? 12 A. Immediately. 13 Q. Do you know who did that? 14 THE COURT REPORTER: I didn't catch what 15 Mr. -- 16 BY MR. CARSON: 17 Q. Daniel, I think the court reporter is 18 having a tough time hearing you. 19 A. Marnie, I believe, is head of human 20 resources. 21 Q. So Marnie would've done that, the 22 actual -- physically making sure he doesn't have 23 access anymore? 24 A. I believe so.</p>	<p style="text-align: center;">---</p> <p>1 want conditions on that, on him coming back? 2 A. Yeah. They reiterated the conditions that 3 we had agreed on. 4 Q. Okay. And so then, I guess, based on 5 that, I think this is what we're talking about. Can 6 you just review this -- this email? Just let me 7 know when you're done. 8 A. Okay. 9 Q. All right. So this is an email that 10 Ms. McNulty sent you on March 11, 2019; is that 11 correct? 12 A. That's what it says. 13 Q. And do you remember receiving this email? 14 A. I do not. 15 Q. But you did receive it? 16 A. I assume it's valid, yeah. 17 Q. Okay. And I'll represent to you it was 18 produced by your lawyers and was marked by your 19 attorneys D0000017. And it says, "My understanding 20 of the meeting outcome is that Gregg will serve as 21 the Forum's director once again with certain 22 parameters in place. At a minimum, the first six 23 months will essentially be a probationary period 24 with Daniel looking over Gregg's shoulder to be sure</p>	Page 252

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<p style="text-align: center;">---</p> <p>1 no improprieties are being made." So Ms. McNulty 2 said -- she allowed for him to return as long as 3 certain parameters remained in place, correct? 4 A. Yep. 5 MR. CAVALIER: Object to form. 6 BY MR. CARSON: 7 Q. She -- she acquiesced to his return as 8 long as certain parameters were in place, correct? 9 A. No. 10 Q. What do you mean, no? 11 A. The verb "acquiesce". 12 Q. What's the word you would use? 13 A. Look at No. 2: "I think there should be 14 no problem with Gregg being in the office." That 15 was not an acquiescence. That was an agreement. 16 Q. Okay. She agreed that he could return as 17 long as certain parameters remained in place, right? 18 A. Right. 19 Q. Okay. We'll use the word "agreement". 20 And one of those parameters was that it be a 21 probationary period, right? 22 A. Right. 23 Q. And -- 24 A. All this confirms the discussion we had on</p>	Page 254	<p style="text-align: center;">---</p> <p>1 at any time should they wish to raise concerns and 2 that, unlike before, there can be no directive to 3 discuss anything with Daniel," right? 4 A. Yup, that's what it says. 5 Q. Sorry. Can you say that louder? 6 A. That's what it says. 7 Q. So, again, it references that, before, 8 Gregg Roman maintained a policy where people weren't 9 allowed to come to you, right? 10 MR. CAVALIER: Object to form. Object to 11 the categorization. 12 BY MR. CARSON: 13 Q. Well, that's what she's talking about, 14 correct? 15 A. That is what she's saying, yes. 16 Q. Did you disagree that he did that? Did he 17 ever disagree he did that? 18 MR. CAVALIER: Object to form. 19 THE WITNESS: All I know is they did come 20 to me, and I acted promptly and effectively, so 21 this whole thing doesn't make much sense to me. 22 BY MR. CARSON: 23 Q. Did you -- 24 A. They did come, and they got the relief</p>	Page 256
<p style="text-align: center;">---</p> <p>1 the 9th of March. This is not breaking ground; this 2 is confirming the points we -- 3 Q. Can you speak up just a little? 4 A. -- the points that Gregg had agreed upon 5 as well at the meeting. He was there at that 6 meeting on March 9th. We all agreed. 7 Q. Where was the meeting on March 9th? 8 A. At the office. 9 Q. It was in your office? 10 A. The Middle East Forum office, yes. 11 Q. In the what? 12 A. Middle East Forum office, yes. 13 Q. Middle East Forum office, okay. And -- 14 and who was at that meeting? Was it you, Gregg, 15 Lisa, Patricia, Marc? 16 A. Marnie, Thelma. I forgot whether it was 17 Delaney or Caitriona. One of them was there, and 18 one wasn't. 19 Q. Okay. 20 A. Matt was there. Essentially, everyone 21 except either Caitriona or Delaney was not there, 22 and Marc was on the telephone. 23 Q. Okay. So it says, "Gregg knows that those 24 in the office are allowed to talk to Daniel directly</p>		<p style="text-align: center;">---</p> <p>1 they sought. 2 Q. Did you know that Gregg Roman dissuaded 3 employees from going to you before November 1st, 4 2018? 5 MR. CAVALIER: Object to form. Lack of 6 foundation. 7 BY MR. CARSON: 8 Q. Did you know that he did that? 9 A. Well, I didn't know that there were 10 allegations that he did that. Whether he did it or 11 not, I don't know, but there were definitely 12 allegations that he told staff to bring their 13 complaints to him and not to me. 14 Q. Well, did you ever talk to him about it? 15 A. I don't remember. What I did make clear 16 is that, henceforth, you are welcome to tell me -- 17 said it again, and, indeed, Tricia's note reflects 18 that -- that, in the future, we are free to come to 19 you. 20 Q. Did you make it clear to Gregg Roman that 21 he wasn't permitted to do that anymore? 22 A. Definitely. Well, I mean, I don't know if 23 he ever did, but definitely he couldn't do that in the future. It was a whole different regime</p>	

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1	<p>---</p> <p>starting in November. Everything changed concerning</p> <p>2 Gregg. He was no longer in the office, no longer</p> <p>3 managing the office --</p> <p>4 Q. It was just a yes or no question,</p> <p>5 Mr. Pipes. I asked, did you make it clear to Gregg</p> <p>6 Roman that he could not tell employees that they</p> <p>7 weren't allowed to come to you?</p> <p>8 MR. CAVALIER: Object to form.</p> <p>9 THE WITNESS: I will answer as I see fit.</p> <p>10 BY MR. CARSON:</p> <p>11 Q. It's just -- did you ever talk to him</p> <p>12 about it? It's a simple question.</p> <p>13 A. I will answer as I see fit, and I did.</p> <p>14 Q. Can you please say yes or no as part of</p> <p>15 your answer?</p> <p>16 MR. CAVALIER: He already did.</p> <p>17 THE WITNESS: -- answer as I see fit.</p> <p>18 BY MR. CARSON:</p> <p>19 Q. Well, I didn't hear you. Was your answer</p> <p>20 yes or no to that?</p> <p>21 A. You're not gonna tell me how to answer.</p> <p>22 Q. I didn't hear --</p> <p>23 ---</p> <p>24 (Indistinguishable cross-talk.)</p>	<p>---</p> <p>1 BY MR. CARSON:</p> <p>2 Q. You think that's a minor detail?</p> <p>3 A. That was a minor detail in the whole</p> <p>4 panoply of complaints. That was one of many</p> <p>5 complaints against Gregg.</p> <p>6 Q. Well, couldn't that explain why no one</p> <p>7 came to you for eight months? You keep talking</p> <p>8 about how -- I don't know why they didn't come to me</p> <p>9 for eight months. I can't believe they didn't come</p> <p>10 to me for eight months. So, in that context, it's</p> <p>11 not very minor if there was a policy that they</p> <p>12 weren't allowed to go to you, right?</p> <p>13 A. No.</p> <p>14 MR. CAVALIER: Object to form.</p> <p>15 THE WITNESS: Makes no sense. First of</p> <p>16 all, they knew from me that my door was open, I</p> <p>17 wanted no surprises, and, secondly, they did</p> <p>18 come to me, and they got satisfaction.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. Okay. They got satisfaction until I</p> <p>21 called them and started a conspiracy against your</p> <p>22 business, right?</p> <p>23 A. Thank you for acknowledging that.</p> <p>24 Q. That's what you think happened, right?</p>	
1	Page 258		Page 260
2	<p>---</p> <p>---</p> <p>BY MR. CARSON:</p> <p>3 Q. Did you say yes or no to that question?</p> <p>4 A. I didn't answer that question. I already</p> <p>5 answered --</p> <p>6 Q. Okay. So can we try to answer that</p> <p>7 question, then? Did you ever talk to Gregg Roman</p> <p>8 about that? Did you ever tell him, hey, I don't</p> <p>9 know whether you did this in the past, but, going</p> <p>10 forward, you can't do that anymore? Did you ever</p> <p>11 say that?</p> <p>12 MR. CAVALIER: Object to form, but you can</p> <p>13 answer that question, Daniel.</p> <p>14 THE WITNESS: That's too specific. I do</p> <p>15 not know what -- I do not remember what exactly</p> <p>16 I said. I do know that I told him that this</p> <p>17 was -- your management of the office personnel</p> <p>18 was terrible. You're not gonna happen --</p> <p>19 you're not gonna be managing it henceforth.</p> <p>20 There's wholesale changes. Among those, any</p> <p>21 possibility of his telling anyone not to talk</p> <p>22 to me, but that was a minor detail of a much</p> <p>23 larger picture. Whether I brought up that</p> <p>24 minor detail specifically or not, I don't know.</p>	<p>---</p> <p>1 A. Yeah.</p> <p>2 Q. That's what you believe, right?</p> <p>3 A. Yeah. \$17 million divided four, five ways</p> <p>4 is a lot of money.</p> <p>5 Q. Did you ever threaten Lisa Barbounis with</p> <p>6 a RICO case?</p> <p>7 MR. CAVALIER: Object to form.</p> <p>8 THE WITNESS: I'm glad you raised that.</p> <p>9 ---</p> <p>10 (Indistinguishable cross-talk.)</p> <p>11 ---</p> <p>12 THE WITNESS: -- explain what happened,</p> <p>13 and you're just gonna have to listen to me.</p> <p>14 BY MR. CARSON:</p> <p>15 Q. I will --</p> <p>16 A. I did not --</p> <p>17 Q. I will allow you to explain, but can you</p> <p>18 please say yes or no as part of your answer? Did</p> <p>19 you ever --</p> <p>20 A. No, I did not. Let me explain.</p> <p>21 Q. Okay. Go ahead.</p> <p>22 A. We met twice on October 12th and October</p> <p>23 14th, a month ago.</p> <p>24 Q. Speak up a little, please.</p>	

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	<p style="text-align: center;">---</p> <p>1 A. And that first time I referenced the RICO  2 case. She expressed complete ignorance of it. So  3 the second time, on October 14th, I brought with me  4 a printout of the letter that you received,  5 Mr. Carson, and presumably had passed on to your  6 client, dated September 29th, informing you of the  7 RICO case. I did not threaten her with it. I  8 informed her, since you apparently did not, that  9 there's a RICO case that had been initiated against  10 her. So, no, there was no threat. It was  11 information, strange information that I should have  12 to provide to her since the letter went to you and,  13 presumably, you received it, and you didn't pass it  14 on to her. So, no, there was no threat whatsoever.  15 All I said was, this is underway. I hope we can  16 reconcile our differences so that this can -- this  17 and everything else can be stopped. She knew about  18 the employment claim; she knew about the  19 counterclaim; she knew about the trade secrets  20 claim. She did not know about the RICO claim.  21 Therefore, I thought it would be useful for her to  22 know about that. That she portrayed it to you as a  23 threat shows, once again, her -- how shall I put  24 it -- lack of veracity. There was no threat. It</p>	<p style="text-align: center;">---</p> <p>1 MR. CAVALIER: Object to form.  2 THE WITNESS: No, I did not.  3 BY MR. CARSON:  4 Q. Did you request the email? Did you ask  5 them to confirm with you that Gregg could come back?  6 A. No.  7 Q. You never said to them, hey, I need you  8 guys to send me an email if he's gonna come back?  9 You gotta send me an email saying that.  10 A. No.  11 Q. So your testimony is that they  12 unilaterally both decided to send you an email  13 confirming that it was okay if he came back on their  14 own?  15 A. No.  16 MR. CAVALIER: Object to form.  17 BY MR. CAVALIER:  18 Q. Well, which one is it?  19 MR. CAVALIER: Object to form.  20 THE WITNESS: Mr. Carson, if you look in  21 front of you, it says, from Marc Fink. It's  22 not from me.  23 BY MR. CARSON:  24 Q. I wasn't referencing anything right now.</p>	<p style="text-align: center;">Page 264</p>
	<p style="text-align: center;">---</p> <p>1 was informational. Here, Lisa, is the letter that  2 was sent about two weeks ago to your counsel, which,  3 for some reason, he didn't make available to you,  4 and then she portrayed that as a threat. No. No  5 threat. But I said, if we don't quit, we will have  6 to go forward with it, and I don't wanna. I'd  7 rather bury this whole thing. We can do this now,  8 you and I. She said no. She can -- subsequently,  9 she wrote me and said, no, she's gonna continue with  10 it. So we are continuing with it as well.  11 Q. Did you use the word "scuttle"? Did you  12 say you'd scuttle the RICO case?  13 A. I do not remember what verbs I used. I  14 can tell you that I suggested that if we reached an  15 agreement between her and the Middle East Forum, all  16 these cases would be closed, including three that I  17 mentioned and the fourth -- the three that she knew  18 about and the fourth that she did not know about.  19 Q. So you asked Ms. McNulty and Ms. Barbounis  20 to send you an email saying that it was okay if  21 Gregg came back to the Forum, right?  22 MR. CAVALIER: Object to form.  23 BY MR. CARSON:  24 Q. You requested that email, right?</p>	<p style="text-align: center;">---</p> <p>1 I was just asking you a question.  2 A. You, you, you, you. No, it wasn't me.  3 Q. I was talking about this one, actually,  4 the email that she sent on March 11th. That was  5 after a meeting you held on March 9th, right?  6 A. I believe it's addressed to Marc Fink, not  7 to me.  8 Q. Right, okay, and you're cc'd on it, right?  9 A. I was cc'd.  10 Q. And she's saying -- she's confirming a  11 meeting, right?  12 A. Mm-hmm.  13 Q. So isn't it true that she was asked to  14 send this email and that Lisa was asked to send a  15 similar email?  16 A. Yes.  17 Q. Okay. Thank you. All right. So the next  18 exhibit will be -- do you think Ms. Barbounis has  19 stolen anything from you?  20 A. Yes.  21 Q. What?  22 A. Trade secrets.  23 Q. What are the trade secrets you think she  24 stole?</p>	<p style="text-align: center;">Page 264</p>

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1	<p style="text-align: center;">---</p> <p>A. A donor list, Middle East Forum internal discussions, Forum projects. I don't know what else.</p> <p>Q. Please just talk a little louder. So when you say "a donor list," what do you mean by that, you know? Like what -- like you think she still has a list of donors' names? Is that what you're saying?</p> <p>MR. CAVALIER: Seth -- one second, Daniel, before you answer -- you're going off into another case.</p> <p>MR. CARSON: No, I'm not. You guys have a counterclaim in this case that's based on this stuff.</p> <p>MR. CAVALIER: To the extent you stay within this case, we'll let you go. I just wanted to let you know that I don't wanna get into a full-blown discussion of --</p> <p>MR. CARSON: Yeah, I don't either. I have two more hours -- two and a half more hours, whatever it is, so I'm trying to --</p> <p>MR. CAVALIER: All right. So long as we're on the same page, I'll certainly grant you a little leeway.</p>	10	<p>she sent information from our donor list to at least one other nonprofit looking to raise funds.</p> <p>Q. Who?</p> <p>A. Amy Mekelburg. And we know that she used our information to try and help the Rebel to raise money from --</p> <p>Q. What's a Rebel?</p> <p>A. It's a media organization in Canada.</p> <p style="text-align: center;">---</p> <p>(Indistinguishable cross-talk.)</p> <p style="text-align: center;">---</p> <p>BY MR. CARSON:</p> <p>Q. Are you talking about Tommy Robinson?</p> <p>A. No, no.</p> <p>Q. Okay.</p> <p>A. We have reason to believe -- we have specifics that she used information of ours to help, and perhaps herself, gain income by helping other nonprofits. So, no, the fact that I have not heard from donors saying, oh, Lisa contacted me, no, that wasn't the issue. The issue was that she was giving it to others, and others would use it, and our donors know that Amy Mekelburg got their names from us.</p>
1	<p style="text-align: center;">---</p> <p>BY MR. CARSON:</p> <p>Q. So -- [unintelligible] -- you think she has a list of the names and donors' names and phone numbers? What're we talking about?</p> <p>A. Yes.</p> <p>Q. Has any of these donors ever told you that she contacted them?</p> <p>A. No.</p> <p>Q. So if she had a list of donors that just happen to be on a hard drive somewhere and she never contacted them, do you have a problem with that?</p> <p>A. Yes.</p> <p>MR. CAVALIER: Object to form.</p> <p>BY MR. CARSON:</p> <p>Q. Do you think that she did something wrong if she -- she did work with the donor list when she worked with the Middle East Forum, right?</p> <p>A. Yes.</p> <p>Q. That was a yes, right?</p> <p>A. Yes.</p> <p>Q. You think she ever stole anything else besides donor list?</p> <p>A. Well, let's not leave that subject yet. We know that she sent it to at least one other --</p>	10	<p style="text-align: center;">---</p> <p>Q. Well, do you know if Amy Mekelburg ever tried to contact a donor?</p> <p>A. I don't. I know that Lisa gave our information to Amy Mekelburg, and that is stealing.</p> <p>Q. What information do you think she gave?</p> <p>A. Our donor list.</p> <p>Q. You think she sent a donor list to Amy Mekelburg?</p> <p>A. I do.</p> <p>Q. Do you think she stole anything else?</p> <p>A. She stole media contacts.</p> <p>Q. What media contacts?</p> <p>A. That was her job, to deal with the media.</p> <p>Q. What media contacts did she steal?</p> <p>A. She stole the list of media contacts.</p> <p>Q. That's your information? Other people's contact information belongs to you?</p> <p>A. Of course. When it's put together into a list, it becomes privileged trade secret information.</p> <p>Q. A list of public information about contacts in the media is trade secrets?</p> <p>MR. CAVALIER: Object to the characterization of the document. Object to</p>

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1	<p style="text-align: center;">---</p> <p>form.</p> <p>THE WITNESS: Same goes with the donors. The donors are generally not secret, but knowing who to go to and what their views are and what their positions are. Likewise, with the media, to know who to go to at a publication or television station is, yeah, important information [inaudible] and she took that from us.</p> <p>BY MR. CARSON:</p> <p>Q. You think that you own information about how to contact TV stations and newspapers? That's your --</p> <p>MR. CAVALIER: Object to the categorization of the testimony. And, Seth, by the way, I gave you a little leeway, but I just wanna remind you the trade secret issues are in a separate --</p> <p style="text-align: center;">---</p> <p>(Indistinguishable cross-talk.)</p> <p style="text-align: center;">---</p> <p>MR. CAVALIER: There are no counterclaims about any theft in this case. [Inaudible] trade secrets.</p>	<p style="text-align: center;">1</p> <p style="text-align: center;">---</p> <p>2 BY MR. CARSON:</p> <p>3 Q. What's your counterclaim, Mr. Pipes? Why</p> <p>4 did you counterclaim in this case?</p> <p>5 MR. CAVALIER: Seth, he -- if you can</p> <p>6 answer that off the top of your head, Daniel.</p> <p>7 THE WITNESS: I can. I'm --</p> <p>8 MR. CAVALIER: Go for it.</p> <p>9 THE WITNESS: I'm here to discuss my being</p> <p>10 the head of the Forum, my being Gregg's</p> <p>11 supervisor. I am not prepared to talk about</p> <p>12 the counterclaim.</p> <p>13 BY MR. CARSON:</p> <p>14 Q. It doesn't matter whether you're prepared.</p> <p>15 That's not my problem, Mr. Pipes. We're gonna talk</p> <p>16 about this because it's your counterclaim, and</p> <p>17 unless you're gonna agree that we can do another</p> <p>18 deposition, talk about the counterclaim --</p> <p>19 MR. CAVALIER: To be clear, we are -- you</p> <p>20 can ask whatever you want about the</p> <p>21 counterclaims, but they are -- the trade</p> <p>22 secrets theft allegations are not part of these</p> <p>23 counterclaims. It's a totally separate case.</p> <p>24 MR. CARSON: Read your counterclaim a</p>	<p style="text-align: center;">1</p> <p style="text-align: center;">---</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>
1	<p style="text-align: center;">Page 270</p> <p style="text-align: center;">---</p> <p>MR. CARSON: I'm following his answer [inaudible].</p> <p>BY MR. CARSON:</p> <p>Q. But, I mean, look. Did she steal anything else besides the names and phone numbers of public information in the media?</p> <p>MR. CAVALIER: Object to form.</p> <p>BY MR. CARSON:</p> <p>Q. Mr. Pipes, I'm trying to --</p> <p>A. -- to discuss this today. I thought we were talking about the employment case.</p> <p>Q. We are, but you made a counterclaim in this case, so it's the same case. So --</p> <p>MR. CAVALIER: Hold on. Seth, hold on. There's no counterclaim for theft of trade secrets or theft of anything.</p> <p>MR. CARSON: Yeah, there is, actually. Read your counterclaim.</p> <p>MR. CAVALIER: I'm looking at it right now.</p> <p>MR. CARSON: Look at it a little closer.</p> <p>MR. CAVALIER: Seth --</p> <p style="text-align: center;">---</p> <p>(Indistinguishable cross-talk.)</p>	<p style="text-align: center;">1</p> <p style="text-align: center;">little more closely, but, Jon, is the \$7,500</p> <p>2 part of the counterclaim?</p> <p>3 MR. CAVALIER: Nobody has alleged that</p> <p>4 Lisa Barbounis stole \$7,000 from the Middle</p> <p>5 East Forum.</p> <p>6 MR. CARSON: Well, tell me what your</p> <p>7 counterclaim is based on --</p> <p>8 MR. CAVALIER: My counterclaim is based on</p> <p>9 breach of duty of loyalty for her failure to</p> <p>10 disclose that she knew about the theft or</p> <p>11 reported to the Middle East Forum, it's civil</p> <p>12 conspiracy based on her interactions with</p> <p>13 Daniel Thomas around that misappropriation, and</p> <p>14 it's fraudulent misrepresentation relating to</p> <p>15 what she told MEF she was doing while she was</p> <p>16 getting paid by them while she was off doing</p> <p>17 other things. There's no trade secret</p> <p>18 allegations in these counterclaims. I'm</p> <p>19 looking at it right here.</p> <p>20 BY MR. CARSON:</p> <p>21 Q. Does that help you, Mr. Pipes? I allowed</p> <p>22 Mr. Cavalier to do that because I thought it might</p> <p>23 help focus the issues.</p> <p>24 A. Okay, yep. It helps remind me, yeah.</p>	<p style="text-align: center;">Page 272</p> <p style="text-align: center;">---</p> <p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p>

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1	---		---
2	Q. So you think that Ms. Barbounis broke the law because she didn't tell you about \$7,500? Is that what you think?	1	A. Danny Thomas.
3	MR. CAVALIER: I'll object to the form.	2	Q. Do you know whether Danny Thomas actually took the money?
4	THE WITNESS: I don't know if it's breaking the law or not.	3	A. Yes. We were told. He admitted it.
5	BY MR. CARSON:	4	Q. He admitted it? Is that your testimony?
6	Q. Well, you sued her and accused her of breaking the law, right?	5	A. I believe so.
7	MR. CAVALIER: Again, object to the form. I think you're confusing the difference between criminal law and a civil violation.	6	Q. Did he also say whether Gregg Roman offered to pay him money for admitting it?
8	BY MR. CARSON:	7	A. He did not say that.
9	Q. Do you know the difference between criminal law and a civil violation?	8	MR. CAVALIER: Object to form.
10	A. I do.	9	BY MR. CARSON:
11	Q. So -- sorry. What was your answer?	10	Q. Did you ever listen to a recording where he said that?
12	A. I do, yes.	11	A. I listened to a recording, and he did not say that.
13	Q. You understand that when I say "break the law," I'm -- I've said it many times today. Gregg Roman broke the law when he violated Title VII in the [unintelligible] Philadelphia Fair Practice Ordinance. You're accusing Ms. Barbounis of breaking the law by violating the duty of loyalty.	12	Q. Oh, he didn't?
14	Page 274	13	A. He didn't.
15	---	14	Q. Do you wanna listen to it right now?
16	1 Do you understand that?	15	A. Sure.
17	A. Okay.	16	---
18	Q. So why do you think Ms. Barbounis violated -- what's her duty of loyalty? What information do you have about that?	17	(Whereupon audio recording was played.)
19	A. She knew about the theft of the \$7,000 and didn't report it.	18	---
20	Q. Why do you think she knew about it?	19	BY MR. CARSON:
21	A. Because we have texts between her and others that indicate that.	20	Q. You heard him just say, "So Gregg contacted me," correct?
22	Q. Do you know if \$7,000 was ever really stolen from you?	21	MR. CAVALIER: I'm gonna object to the fact that that sounds incomprehensible to me, but to the extent --
23	A. We have her text to tell us that as well as other people's information.	22	BY MR. CARSON:
24	Q. Have you ever confirmed whether that money was ever really stolen from you?	23	Q. You heard him just say, "So Gregg contacted me," correct?
25	A. It was stolen in the sense that it was meant for one purpose and used for another.	24	A. I heard those words spoken. I don't know who spoke them.
26	---	25	Q. Okay.
27	(Indistinguishable cross-talk.)	26	---
28	---	27	(Whereupon audio recording was played.)
29	BY MR. CARSON:	28	---
30	Q. What purpose was it used -- who stole the money?	29	BY MR. CARSON:
31		30	Q. Did you ever hear that recording before?
32		31	A. I did not.

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1	---		---
2	Q. You never listened to that recording 3 before? Do you think it's troubling that he's 4 saying, "I'm gonna fuckin' testify against that 5 cunt"? Like do you think that's credible?	1 BY MR. CARSON: 2	1 BY MR. CARSON: 2
6	A. I have no idea who's speaking, and I don't 7 know what the subject is.	3 Q. That's the question. Are you aware of 4 anyone asking for money to be returned?	3 Q. That's the question. Are you aware of 4 anyone asking for money to be returned?
8	Q. I mean, you testify all day about 9 credibility, Mr. Pipes.	5 A. No.	5 A. No.
10	A. I didn't even understand half of it, so 11 provide a transcript, and let's go over it.	6 Q. Mr. Pipes, if Danny Thomas never really 7 stole money, then is there anything that Lisa did 8 wrong?	6 Q. Mr. Pipes, if Danny Thomas never really 7 stole money, then is there anything that Lisa did 8 wrong?
12	Q. We'd be happy --	9 MR. CAVALIER: Object to the hypothetical, 10 lack of foundation.	9 MR. CAVALIER: Object to the hypothetical, 10 lack of foundation.
13	(Indistinguishable cross-talk.)	11 BY MR. CARSON: 12	11 BY MR. CARSON: 12
14	---	13 Q. I mean, it's the basis for your 14 counterclaim is that money was stolen from you, right?	13 Q. I mean, it's the basis for your 14 counterclaim is that money was stolen from you, right?
15	THE WITNESS: -- who spoke this and so 16 forth. I have no idea what this is.	15 A. There are -- I don't know.	15 A. There are -- I don't know.
17	BY MR. CARSON:	16 Q. Well, have you ever seen any evidence that 17 money was stolen from you?	16 Q. Well, have you ever seen any evidence that 17 money was stolen from you?
18	Q. Have you ever had a conversation with him?	18 A. What do you mean by "evidence"?	18 A. What do you mean by "evidence"?
19	A. With who?	19 Q. Have you ever seen any evidence that Danny 20 Thomas actually took money that was donated for a 21 Tommy Robinson campaign and that he spent on 22 something else? Has anyone ever provided evidence 23 of that?	19 Q. Have you ever seen any evidence that Danny 20 Thomas actually took money that was donated for a 21 Tommy Robinson campaign and that he spent on 22 something else? Has anyone ever provided evidence 23 of that?
20	MR. CAVALIER: Object to form.	24 MR. CAVALIER: Object to form.	24 MR. CAVALIER: Object to form.
21	BY MR. CARSON:		
22	Q. Danny Thomas.		
23	A. No.		
24	Q. Have you ever asked him to return the money?		
	Page 278		Page 280
1	MR. CAVALIER: Object to form.	1 BY MR. CARSON: 2	1 BY MR. CARSON: 2
2	THE WITNESS: No.	3 Q. What was that evidence?	3 Q. What was that evidence?
3	BY MR. CARSON:	4 A. The many texts going back and forth 5 between him and Lisa, maybe others, about this misappropriated money.	4 A. The many texts going back and forth 5 between him and Lisa, maybe others, about this misappropriated money.
4	Q. Why -- if you think he stole money from 5 you, why haven't you asked him to return it?	6 Q. Are you talking about the texts where he 7 says, I never stole money?	6 Q. Are you talking about the texts where he 7 says, I never stole money?
5	A. I have not dealt with the specifics of 6 this. Gregg has. You have to ask him.	8 MR. CAVALIER: Object to form.	8 MR. CAVALIER: Object to form.
6	Q. Nobody's asked him to return the money, 7 though, right?	9 THE WITNESS: No. I'm talking about where 10 they discussed the money that he had taken that 11 was meant for other purposes.	9 THE WITNESS: No. I'm talking about where 10 they discussed the money that he had taken that 11 was meant for other purposes.
7	MR. CAVALIER: Object to form.	12 BY MR. CARSON:	12 BY MR. CARSON:
8	THE WITNESS: All I can tell you is that I 9 did not authorize any payment of money to Danny 10 Thomas, and I would not. It's --	13 Q. You saw text messages where Danny Thomas 14 and Lisa Barbounis discussed money that Danny Thomas 15 stole?	13 Q. You saw text messages where Danny Thomas 14 and Lisa Barbounis discussed money that Danny Thomas 15 stole?
9	MR. CARSON: You have to speak up. Can 10 you hear him, because I can't hear him at all.	16 A. Yes.	16 A. Yes.
10	THE COURT REPORTER: It's very quiet.	17 Q. Really?	17 Q. Really?
11	MR. CARSON: I mean, you just --	18 A. I believe so.	18 A. I believe so.
12	Mr. Pipes, we're doing this on a video 13 recording, so you just gotta make it so we can 14 hear you, man. Can you read the last question?	19 Q. What did they say?	19 Q. What did they say?
13	---	20 A. I don't memorize these things. I'm sure 21 we can produce it for you quickly enough.	20 A. I don't memorize these things. I'm sure 21 we can produce it for you quickly enough.
14	(Whereupon the court reporter read back the pertinent testimony.)	22 Q. I would love to see those text messages.	22 Q. I would love to see those text messages.
15		23 You saw text messages where Danny Thomas and Lisa 24 are talking about seven -- how much was it that was	23 You saw text messages where Danny Thomas and Lisa 24 are talking about seven -- how much was it that was

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1	supposedly stolen? A. \$7,000. Q. You saw text messages where they're talking about \$7,000, and they both are agreeing that he took the money? A. I believe so. Be happy to find you the -- Q. Yeah, no. Please, I would ask, if you have those text messages, I'd ask you to please produce them. A. Okay. Q. Because I've never seen a text message like that. A. Okay. Q. I'll move on. Is that the only basis of your counterclaim is this \$7,000? MR. CAVALIER: Object to the form and the characterization of the counterclaim. MR. CARSON: I'm asking what the basis of it is. MR. CAVALIER: You're asking him what the basis of the counterclaim is. That involves all kinds of legal conclusions and analysis. If you wanna -- - - -	1 \$7,000? 2 MR. CAVALIER: Gonna object as asked and 3 answered. 4 THE WITNESS: Provide me the documents, 5 and I will then tell you -- give you an answer, 6 but I can't -- 7 BY MR. CARSON: 8 Q. What document should I provide you that 9 will help you answer that question? 10 A. Counterclaim. Provide me with the 11 counterclaim. 12 Q. It's your counterclaim. 13 A. Right, but I -- 14 Q. You want me to show you your counterclaim 15 so you can answer a question about your 16 counterclaim? 17 A. I did not memorize it. It's a long, 18 complicated document with many legal aspects which I 19 cannot recite to you. 20 Q. So, sitting here right now, you don't know 21 of any other basis for the counterclaim other than 22 the 7,000 -- 23 MR. CAVALIER: Object to form. Object to 24 the miscategorization of testimony. He's		
1	1 (Indistinguishable cross-talk.) - - - 3 BY MR. CARSON: 4 Q. Is there any other reason why you decided to make a counterclaim against Lisa Barbounis other than the \$7,000 that -- 7 MR. CAVALIER: Object to form. Are you talking about just the breach of fiduciary duty claim, or you talking about the other counterclaim? 11 BY MR. CARSON: 12 Q. All of them. Is there any other claims? 13 Are any of them based on anything other than the \$7,000? 15 A. It's a long document that I have not memorized, so if you want me to go back and review it, I -- 18 - - - 19 (Indistinguishable cross-talk.) 20 - - - 21 BY MR. CARSON: 22 Q. Testify to the best of your knowledge right now. To your knowledge, is there any other basis for any of the counterclaims other than the	1 answered the question to the best of his ability, Seth. 3 MR. CARSON: Actually, he hasn't. 4 BY MR. CARSON: 5 Q. But just clear it up. Sitting here right now, without looking at the counterclaim, without reading it, do you know of any other basis for the counterclaim other than the \$7,000? 9 A. Sitting here -- 10 MR. CAVALIER: Object to form. 11 THE WITNESS: I'm not gonna be trapped by you. 13 BY MR. CARSON: 14 Q. It's not a trap. 15 A. Let me finish -- 16 Q. Your lawyer entered his objection. Just answer the question, yes or no. It's simple. We can move on. 19 A. Sitting here right now, I am not gonna be trapped by you into giving an incomplete version of the counterclaim. It's in black and white. I can read it, I can bone up on it, I can recite it to you, but I can't do it for you right now. I'm focused on the timeline of what happened, and that's	Page 282	Page 284

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	<p style="text-align: center;">---</p> <p>1 what I can speak about with confidence. The 2 counterclaim I'm not prepared to talk about.</p> <p>3 Q. Lisa Barbounis had your permission to work 4 with Tommy Robinson, correct, on her own time?</p> <p>5 MR. CAVALIER: Object to form.</p> <p>6 THE WITNESS: When?</p> <p>7 MR. CAVALIER: -- date range on that?</p> <p>8 BY MR. CARSON:</p> <p>9 Q. Anytime. She had your permission at 10 sometime in your life to work with Tommy Robinson?</p> <p>11 A. Until she abused it, yes.</p> <p>12 Q. You said to her, you can do what you want 13 on your own time, right?</p> <p>14 A. Until she abused that, and then I took it 15 away.</p> <p>16 Q. You actually said to her, I'm hesitant to 17 tell you what to do on your own time. You can do 18 what you like, right?</p> <p>19 A. Until she abused that, and I took it away.</p> <p>20 Q. Is there any basis -- is there any policy 21 in the Middle East Forum maintained that an employee 22 of the Middle East Forum isn't allowed to have a 23 second job?</p> <p>24 A. No, but there is a policy that we cannot</p>	<p style="text-align: center;">1 THE WITNESS: She appeared in photographs 2 and in other media in Britain being part of the 3 Tommy Robinson campaign. They didn't care 4 whether she was paid or not, and I don't care 5 if she was paid or not. I care --</p> <p>6 BY MR. CARSON:</p> <p>7 Q. I can't hear you.</p> <p>8 A. It didn't matter that she was paid or not. 9 It mattered that she was portrayed in British 10 media -- prominent British media -- as part of the 11 Tommy Robinson campaign.</p> <p>12 Q. But at the time that those pictures were 13 taken, she did have your permission to be there, 14 right?</p> <p>15 A. She had my permission to be there. She 16 did not have my permission to be engaged in the 17 campaign and to be publicly associated with the 18 campaign as a Middle East Forum employee.</p> <p>19 Q. Right, but she did have your permission to 20 do that on her own time at that time?</p> <p>21 MR. CAVALIER: Object to form.</p> <p>22 THE WITNESS: I don't know which time 23 you're speaking about --</p> <p style="text-align: center;">---</p>	
	Page 286		Page 288
	<p style="text-align: center;">---</p> <p>1 be involved in politics, and when British media 2 portray a Middle East Forum employee as working on 3 the Tommy Robinson campaign, red lights go off all 4 over the place, and I had to stop that.</p> <p>5 Q. So -- but she's allowed to work on 6 politics as long as it's not related to her job at 7 the Middle East Forum, right?</p> <p>8 A. That was the initial point. Later, I said 9 you gotta stop it entirely because you've crossed 10 the line.</p> <p>11 Q. And after you said that she has to -- 12 well, when did you say she has to stop it entirely?</p> <p>13 A. You have the dates. Sometime --</p> <p>14 Q. You know when?</p> <p>15 A. I don't remember the exact date, but in 16 the spring of 2019.</p> <p>17 Q. Do you know if she ever was paid by Tommy 18 Robinson?</p> <p>19 A. I do not.</p> <p>20 Q. Sorry? I didn't hear you.</p> <p>21 A. No, I don't know.</p> <p>22 Q. She just did some volunteer work for the 23 guy, right?</p> <p>24 MR. CAVALIER: Object to form.</p>	<p style="text-align: center;">(Indistinguishable cross-talk.)</p> <p style="text-align: center;">---</p> <p>1 THE WITNESS: -- I don't remember 2 [inaudible] was before or after, but, 3 initially, she had it, and then I took it away.</p> <p>4 BY MR. CARSON:</p> <p>5 Q. But the problem you had with her is that 6 her picture was taken, and you were worried about 7 the exposure it might have or the blowback it might 8 have on the Middle East Forum, correct?</p> <p>9 A. No.</p> <p>10 Q. Okay. Then what were you worried about?</p> <p>11 A. Legal consequences.</p> <p>12 Q. The blowback, the -- aren't we saying the 13 same thing, Mr. Pipes?</p> <p>14 A. I don't know what "blowback" means. I 15 know that this is legally unacceptable for us to --</p> <p>16 Q. Blowback, consequences, repercussions.</p> <p>17 All means the same thing. So would you like me to 18 use the word "consequences"? Were you worried about 19 the consequences that her picture in the paper might 20 have? I think it was The Guardian, correct?</p> <p>21 A. I believe so.</p> <p>22 Q. So you were worried about the consequences</p>	

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1	that picture might have on the Middle East Forum; is 2 that right? 3 A. Correct. 4 Q. But at the time that picture was taken, 5 she did have your permission to work with him on her 6 own time, right? 7 A. I'm not sure. 8 Q. Did you fire her after that? 9 A. I never fired her. 10 Q. Sorry? 11 A. I never fired her. 12 Q. Right. You knew that the picture was 13 taken, you talked to her about it, and she continued 14 her employment thereafter, correct? 15 A. She continued her employment, and then she 16 continued her working with Tommy Robinson against my 17 wishes. 18 Q. But are you -- 19 A. -- so far as to lie to me -- let me 20 finish. She went so far as to lie to me that she 21 took her children to Britain when she didn't, and 22 then she lied further and pretended that I'd agreed 23 with her and connived with her to say that she'd 24 taken her children to Britain when she --	---	1 2 (Indistinguishable cross-talk.) 3 4 THE WITNESS: No. She lied to me. The 5 first time she -- let me finish. The first lie 6 was to tell me that she went to Britain with 7 her children, and her second lie was to tell, 8 subsequently, that I agreed to that lie, that I 9 was in on that lie with her. 10 BY MR. CARSON: 11 Q. Well, maybe she thought you knew that she 12 wasn't there with her kids, right? 13 A. Didn't know that. She knew that she lied 14 to me about taking her children, and then she 15 pretended that I had agreed to that lie, that I 16 connived in that lie with her, that I was party to 17 that lie, so a double lie. First, the children, and 18 then my agreements. Lies, lies, lies. Your clients 19 tell lies, Mr. Carson. 20 Q. Mr. Pipes, have you counted the number of 21 inconsistencies in your testimony today? 22 MR. CAVALIER: Object to form. Daniel, 23 you don't have to answer that. 24 BY MR. CARSON:
1	---	---	Page 292
2	Q. We can't hear you. 3 A. -- when I had -- 4 MR. CARSON: Can you hear him? 5 THE COURT REPORTER: Little bit. 6 BY MR. CARSON: 7 Q. Mr. Pipes, it's really hard to hear you 8 today. Like you have to just speak up and talk 9 loud. I don't know what else to tell you. It's 10 literally almost impossible to hear what you're 11 saying. You were talking about a picture that was 12 taken, and then you were talking about Ms. Barbounis 13 telling you that she was there with her kids, right? 14 A. Right. 15 Q. Yes? 16 A. Yes. 17 Q. Okay. So wasn't she telling you that to 18 give the Middle East Forum cover to help the Middle 19 East Forum? 20 MR. CAVALIER: Object to form. 21 THE WITNESS: No. 22 BY MR. CARSON: 23 Q. Because you were worried about her being 24 there and associated with the Middle East Forum, she was saying, hey, I was just there with my kids?	---	1 2 Q. You don't have to answer that, but I'd be 3 careful telling other people that they're lying. So 4 let's just keep going. Speaking of lies -- all 5 right. So let's look at a document that's dated -- 6 it's gonna be 21 and 22 and 23, all right? And I 7 forgot we're on a screen share, so that's all the 8 discovery. All right. So 22, 23. All right, 9 ready? Here is Document No. 22. Do you see when 10 this email was sent? It was -- here's a date right 11 here. 12 A. Yep. 13 Q. That's after November 5th, 2018, right? 14 A. Right. 15 Q. It's afterwards, right? And it's from 16 Tricia to you, correct? 17 A. Yup. 18 Q. You wanna take a minute and read this? 19 A. Okay. Okay. 20 Q. So these are complaints about Gregg Roman 21 made after November 5th, 2018, correct? 22 A. Correct. 23 Q. Didn't you testify there were none? 24 A. Correct. 25 Q. Didn't you specifically testify there were

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1	absolutely none from Tricia McNulty? A. Right. Q. Okay. Well, let's start counting, then, since we're gonna talk about this next. So number one would be the April 23rd, 2019 email from McNulty, okay? And this email actually has a lot of complaints in it; it's not just one complaint, right? A. Yep. Q. It talks about a complaint that Marnie made. It talks about a complaint that Caitriona Brady made, right? A. Right. Q. So what did you do about this? Did you investigate this? A. Yes. Q. Did you fire Gregg Roman? A. No. Q. Why not? A. Why should I? Q. I don't know. Maybe because retaliation is against the law, correct? MR. CAVALIER: Object to form. You don't have to answer that if you don't want to.	Page 294	1 A. I don't know. 2 Q. Don't you find it a little disturbing that 3 when Gregg Roman doesn't know who the person is 4 who's alleging the harassment, he guesses and gets 5 it wrong? 6 MR. CAVALIER: Object to form. Object to 7 the mis -- 8 BY MR. CARSON: 9 Q. How many women does someone have to harass 10 where, when someone accuses them of harassment, they 11 can't even guess the right person? 12 MR. CAVALIER: Object to form. Object as 13 argumentative. Daniel, I don't even know if 14 that's an actual question, but, to the extent 15 it is, you don't have to answer it -- 16 BY MR. CARSON: 17 Q. It's at least two, right? Can't be one, 18 correct? 19 MR. CAVALIER: Object because I don't 20 understand what the question is. 21 BY MR. CARSON: 22 Q. Right. In order to not know who the 23 person is making the allegation of harassment, you'd 24 have to harass multiple people; is that right?
1	---	Page 294	---
1	BY MR. CARSON: Q. Retaliation is against the law, right? Do you know it's against the law? A. I don't see retaliation. Q. Well, if Gregg Roman is responding to all the reports of discrimination and harassment by subjecting the women who made the reports to further harassment, that would be retaliation, correct? MR. CAVALIER: Object to the hypothetical. Object to -- BY MR. CARSON: Q. That your understanding of what retaliation is? A. Hypothetical. MR. CAVALIER: Same objections. BY MR. CARSON: Q. Well, tell me your understanding of retaliation. A. I'm not a legal specialist. Q. Okay. But do you understand that retaliation is against the law? A. Yes. Q. And does MEF have a policy prohibiting retaliation?	Page 296	1 MR. CAVALIER: Object to the hypothetical. Object to form. 3 MR. CARSON: You can answer. 4 MR. CAVALIER: Object as argumentative. 5 BY MR. CARSON: 6 Q. Go ahead. You can answer. 7 A. I don't know the law. 8 THE COURT REPORTER: What was that, sir? 9 THE WITNESS: I don't know the law in 10 detail. 11 BY MR. CARSON: 12 Q. Mr. Pipes, who's Gabrielle Bloom? 13 A. I don't know. 14 Q. Well, did you check to see whether money 15 was paid to her? 16 A. I investigated this at the time. 17 Q. Did you find that money was paid to her 18 from the Middle East Forum? 19 A. I don't remember. 20 Q. You don't know whether money was paid to 21 her? 22 MR. CAVALIER: Object to form. 23 BY MR. CARSON: 24 Q. Was it hush money?

	Page 297		Page 299
1	<p style="text-align: center;">---</p> <p>A. I did not authorize any money going to 2 Gabrielle Bloom.</p> <p>3 Q. How much money got paid to her?</p> <p>4 MR. CAVALIER: Object to form. That's not 5 what he said.</p> <p>6 BY MR. CARSON:</p> <p>7 Q. How much money did MEF issue to Ms. Bloom 8 that wasn't on a W-2?</p> <p>9 MR. CAVALIER: Object to form.</p> <p>10 THE WITNESS: I know of no such money.</p> <p>11 BY MR. CARSON:</p> <p>12 Q. Sorry?</p> <p>13 A. I know of no such money.</p> <p>14 Q. Well, you did say that you investigated 15 whether money went to her, correct?</p> <p>16 A. I don't remember any money going to her.</p> <p>17 Q. My question was, did you investigate 18 whether the Middle East Forum issued money to 19 Gabrielle Bloom?</p> <p>20 A. I looked into it and did not find any 21 money.</p> <p>22 Q. Did you ever try to call Gabrielle Bloom 23 to talk to her?</p> <p>24 A. She did not contact me to complain, so,</p>	<p style="text-align: center;">---</p> <p>1 Daniel. Object to form. Object, lack of 2 foundation. Object, argumentative.</p> <p>3 BY MR. CARSON:</p> <p>4 Q. I didn't try to create a foundation.</p> <p>5 Whether true or not, that's ten women's names who 6 could possibly be linked to harassment by Gregg 7 Roman, right?</p> <p>8 MR. CAVALIER: Question you're asking him 9 is, did you just name ten people?</p> <p>10 BY MR. CARSON:</p> <p>11 Q. Yes. Did I just name ten women?</p> <p>12 A. Yes, and I congratulate you on finding all 13 these different women to --</p> <p>14 Q. Right, and [unintelligible] --</p> <p>15 ---</p> <p>16 (Indistinguishable cross-talk.)</p> <p>17 ---</p> <p>18 THE WITNESS: Let me finish.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. I said, did I name ten women? That was 21 the question. You said yes.</p> <p>22 A. But I get to answer the way I want to 23 answer.</p> <p>24 Q. No, actually, you don't.</p>	
1	<p style="text-align: center;">no.</p> <p>2 Q. That's part of your policy where you won't 3 investigate anything unless [inaudible] comes to you 4 first, correct?</p> <p>5 MR. CAVALIER: Object to form.</p> <p>6 THE WITNESS: My concern here, as in other 7 cases, was the welfare of the employees who 8 worked with me -- in this case, Marnie, Matt 9 Bennett, and Tricia McNulty -- and that's who I 10 focused on.</p> <p>11 BY MR. CARSON:</p> <p>12 Q. Aren't you concerned when there is -- 13 let's just count it now, right? There's Patricia 14 McNulty, right; there's Lisa Barbounis; there's Lea 15 Merville; there's Delaney Yonchek; there's Caitriona 16 Brady; there's Marnie Meyer; there's Tiffany Lee; 17 there's Laura Frank; there's Lara -- we don't know 18 her last name -- and now there's Gabrielle Bloom; 19 one, two, three, four, five, six, seven, eight, 20 nine -- ten women who might have been harassed by 21 Gregg Roman by this point. Whether true or not, 22 that's ten women who may have been harassed by him, 23 correct?</p> <p>24 MR. CAVALIER: Object to form. Hold on,</p>	<p style="text-align: center;">Page 298</p> <p>---</p> <p>1 A. You can't stop me.</p> <p>2 Q. I asked you if that was ten. Do you wanna 3 expand on your answer of whether ten equals ten? Go 4 ahead. Tell me what you have to say about the 5 number ten.</p> <p>6 A. [Inaudible]. Very kind of you to allow me 7 to speak.</p> <p>8 Q. Go ahead, go ahead.</p> <p>9 A. Yes, and I congratulate you on [inaudible] 10 bring up against the Forum and Gregg. It was --</p> <p>11 Q. We can't hear you.</p> <p>12 THE COURT REPORTER: Yeah. Can you start 13 your answer again, please, Mr. Pipes?</p> <p>14 BY MR. CARSON:</p> <p>15 Q. We can't hear you at all.</p> <p>16 A. I said fine work, Mr. Carson, on finding 17 ten women to name as you just did.</p> <p>18 Q. That's your answer?</p> <p>19 A. That's my answer.</p> <p>20 Q. You're welcome. Thank you for saying fine 21 work. But the point, Mr. Pipes, is that this is ten 22 names that you are now in possession of. By 23 April 23rd, 2019, you had all ten of these women's names in front of you, right?</p>	Page 300

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1	A. I'm not sure.	1	A. No, she's not.
2	Q. Sorry?	2	Q. That's not inappropriate conduct to spread
3	A. I'm not sure. I haven't counted them.	3	a rumor about someone's father having sex? Nothing
4	Q. Well, you definitely had Gabrielle Bloom's	4	wrong with that?
5	name in front of you, right?	5	A. I thought your list was --
6	A. Right.	6	MR. CAVALIER: Object to form.
7	Q. Yeah?	7	THE WITNESS: -- women who allege that
8	A. Yeah.	8	Gregg had misbehaved with.
9	Q. You had Caitriona Brady's name in front of	9	BY MR. CARSON:
10	you. That name's in this email, correct?	10	Q. Oh. Well, if you want that list, that's
11	A. Right.	11	fine. We can take two names off, so now we have
12	Q. You had --	12	eight women who said that. So you wanna do that?
13	A. Well, no, no, no. There was no allegation	13	I'm fine with doing that. Let's take off Delaney
14	against -- by Caitriona against Gregg, no.	14	Yonchek, and let's take off Caitriona Brady. So now
15	Q. You don't think she's upset that Gregg	15	there's eight women by April of 2019 who allege
16	Roman is telling people that her dad and her boss	16	sexual misconduct, right, and you're aware of all of
17	had sex?	17	them by April 2019, right?
18	A. She was upset but --	18	MR. CAVALIER: Object to form. Object to
19	MR. CAVALIER: I think you mis -- I think	19	lack of foundation.
20	you mischaracterized the rumor.	20	THE WITNESS: I'm aware of what exactly?
21	MR. CARSON: Yeah, no. It's worse than	21	BY MR. CARSON:
22	what I said. It's that Marnie Meyer got her	22	Q. That there's eight women who potentially
23	job because her dad had sex with her.	23	were harassed by Gregg Roman by April of 2019,
24	MR. CAVALIER: I think you still got the	24	sexually --
	Page 302		Page 304
1	parties a little mixed up, but, Daniel, if you	1	A. Where does it say that Gabrielle Bloom was
2	can answer the question, go ahead.	2	sexually harassed?
3	-----	3	Q. "I received a phone call from Matt Bennett
4	(Indistinguishable cross-talk.)	4	last night. He started the conversation with
5	-----	5	pleasantries, but then began to discuss current MEF
6	BY MR. CARSON:	6	internal operations. He is apparently speaking to
7	Q. Caitriona Brady's dad and Marnie Meyer	7	Gregg every two days, knew that Gary was back, and
8	having sex is the rumor.	8	also that Marnie had made another allegation against
9	A. Caitriona did not allege, until you got	9	Gregg, which Gregg was very upset about because he
10	your hands on her, that Gregg did anything against	10	didn't know what the allegation was. They were
11	her --	11	apparently concerned that Marnie might have gone out
12	Q. -- sent this email. I didn't talk to them	12	to find an old intern by the name of Gabrielle
13	in April 2019.	13	Bloom. The story there, as I was told, was that
14	A. Show me in the email where Caitriona says	14	Gabrielle Bloom would be able to testify about a
15	that Gregg did something sexually inappropriate with	15	personal relationship with Gregg Roman." Right?
16	Caitriona.	16	A. Do I hear anything here about sexual
17	Q. That's not what I said.	17	misbehavior?
18	A. What did you say?	18	Q. That's not the point, Mr. Pipes. The
19	Q. I said that Caitriona Brady is upset that	19	point is you were in possession of another name that
20	Gregg is talking about her father and Marnie Meyer	20	you could've investigated.
21	having sex.	21	MR. CAVALIER: Object to form.
22	A. Agreed on that, but what is the list of --	22	THE WITNESS: -- investigating that Gregg
23	how do you --	23	may or may not have had sexual relationship
24	Q. Well, Caitriona's one of them, right?	24	with Gabrielle Bloom. Any --

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1	---	1	---
2	---	2	Q. And he was wrong, actually. Gregg thought
3	(Indistinguishable cross-talk.)	3	that, when the allegation came up, it was Gabrielle
4	---	4	Bloom, but it wasn't, right? It was Caitriona Brady
5	THE WITNESS: -- that Lisa Barbounis had a	5	and her father and Marnie Meyer, correct?
6	sexual relationship with a member of the MEF	6	A. No idea what you're talking about.
7	staff. I don't do this.	7	Q. What?
8	---	8	A. I don't know what you're talking about.
9	(Indistinguishable cross-talk.)	9	Q. Well, what allegation was brought up to
10	---	10	you at this time? What were they talking about,
11	THE WITNESS: -- Gabrielle -- there's no	11	Mr. Pipes? Says it right here.
12	allegation of sexual misbehavior here.	12	A. There was a rumor about Marnie and
13	Gabrielle Bloom did not come to me. Why is	13	Caitriona's father. I tried to investigate it. I
14	this my concern? It's not my concern. Marnie	14	bumped up quickly against a brick wall of
15	is going off and doing research to find who	15	contradictory allegations, and I remember concluding
16	Gregg may or may not have had sex with. Really	16	that I just can't. I can't. It's not a murder. I
17	not my issue.	17	don't have to devote weeks of my life to this. I
18	BY MR. CARSON:	18	just couldn't figure out what went on, and I
19	Q. But you did testify earlier there's a	19	announced to everyone that I just -- I'm --
20	difference between friends and a	20	Q. You weren't doing anything?
21	supervisor/supervisee relationship, correct?	21	A. No. I did.
22	A. Correct.	22	MR. CAVALIER: Object to form.
23	Q. And Gregg is the supervisor of Gabrielle	23	THE WITNESS: I went as far as I could,
24	Bloom, correct?	24	and I couldn't go further and figure out what
	A. I'm not sure --		was at the bottom of this, who had initiated
	Page 306		Page 308
1	---	1	---
2	MR. CAVALIER: Object to form.	2	this rumor, whether it was true or not, who had
3	THE WITNESS: I don't think so.	3	initiated. I couldn't find out anything, and
4	BY MR. CARSON:	4	eventually I just told everyone I am not doing
5	Q. Well, Gregg was the director of the Middle	5	this.
6	East Forum, and Gabrielle Bloom was an intern,	6	BY MR. CARSON:
7	correct?	7	Q. So Patricia's also reporting to you that
8	A. That's what it says here. I don't know	8	Gregg Roman is slandering her, right, and the
9	what Gabrielle Bloom is.	9	other -- and Lisa?
10	Q. And you don't know because you never	10	A. Yeah, and I looked into that as well, and
11	looked into it, right?	11	this was Matt telling her what Gregg's comments
12	A. Right.	12	were. So it, again, was the complex matter. Matt
13	Q. Didn't you say in an email back in	13	and Gregg have a long and difficult -- not
14	November if there's another credible allegation of	14	difficult, but --
15	sexual harassment by him that he'd be fired? So	15	Q. We can't hear you.
16	when you hear another name, don't you go out and try	16	A. Matt and Gregg have a long relationship
17	to look into it?	17	going back many years, I think to college. They
18	A. There's no allegation of sexual	18	have their ups and downs. Matt was very angry at
19	misbehavior here.	19	Gregg. Matt wanted Gregg's job. Matt was full of
20	Q. That's your testimony. It's fine.	20	high emotions, as you heard when he testified, when
21	A. But will you show me where this allegation	21	he deposed the other day -- lost a child, all sorts
22	of sexual misbehavior here, because I don't see it.	22	of things going on -- and he had a particular
23	Q. If you're comfortable with that testimony,	23	friendship with Tricia, and I looked into this, and
24	then we can move on.	24	I couldn't tell what the truth was. And, again,
	A. I am comfortable with that testimony.		this is not a murder.

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1	<p>Q. Not that serious.</p> <p>A. It wasn't a murder. I could only go so far to try and figure out who said what. I quizzed Tricia. I quizzed Matt. I quizzed Gregg. I tried to find out who said what to who and when, and I ended up with no resolution. At a certain point, I gave up, as with the other thing, because I was getting such contrary stories. I never imagined a place of work would be such a hotbed of personal -- intense personal relations of vulgarity, of backstabbing, and so forth. I was unaware that this was taking place, and when I became aware, as with this note, I did my best to investigate, and I just couldn't track these things down -- who's saying what? Where does the rumor come from? Who actually said what? Is this-and-that making it up? Did Gregg actually say this? Did Tricia exaggerate it? I couldn't figure it out in the end.</p> <p>Q. Do you think Tricia was exaggerating?</p> <p>A. I don't know.</p> <p>Q. Does she sound like she is in this letter?</p> <p>A. I don't know what the actual story was.</p> <p>Q. Well, the only -- everyone is saying the same thing but Gregg, though, right? It's basically</p>	<p>A. Let me finish. Don't characterize -- don't put words in my mouth.</p> <p>Q. Is that what you're saying? Was it --</p> <p>A. Let me finish. Why do you continuously interrupt me?</p> <p>Q. Mr. Pipes, I asked you another yes or no question. You go on and on and on, and you're not answering the question that we're asking, but go ahead. Take your time. Tell us why -- why you -- why you accept Gregg's word every time he denies it.</p> <p>MR. CAVALIER: Object to form.</p> <p>THE WITNESS: You are mischaracterizing what I just said. I did not --</p> <p>BY MR. CARSON:</p> <p>Q. It was just a question.</p> <p>A. Well, it's a "when did you stop beating your wife" question. No, I can't answer that question. I'm not gonna answer that question. The question is, why do you always accept Gregg's word? No, I don't accept Gregg's word. I --</p> <p>Q. Just give me an example [inaudible] --</p> <p>A. I am giving you an example. I made two inquiries into the two issues here, one about Gabrielle Bloom, and one about the rumor. In both</p>
1	<p>everyone accusing Gregg of doing something, Gregg denies it, and you accept Gregg's word every time. That's the pattern, right?</p> <p>MR. CAVALIER: Object to form.</p> <p>Argumentative.</p> <p>BY MR. CARSON:</p> <p>Q. It's not argumentative. Is that the pattern?</p> <p>A. No, it's not the pattern. I did not accept Gregg's word. I --</p> <p>Q. When haven't you accepted his word? Give me an example of when you haven't.</p> <p>A. Let me finish.</p> <p>THE COURT REPORTER: Guys, I'm not getting much, just so you know.</p> <p>THE WITNESS: I did not accept Gregg's word. I found contradictory. I did not endorse Gregg at expense of the others. I did not endorse the others at Gregg's expense. I came away unable to discern the truth, and, as it wasn't a matter of enormous import, but rather backstabbing going on --</p> <p>BY MR. CARSON:</p> <p>Q. It was minor.</p>	<p>cases, I came up against contradictory information -- what Marnie was saying, what Lisa was saying, what Gregg was saying in the first case, what Gregg was saying, what Matt was saying, what Tricia was saying in the second case -- were all different. As this was not an issue that was potentially a fireable issue, as this was not -- this was staff gunning for -- gunning for Gregg's job, disliking each other, allying with each other, at a certain point, I threw up my hands in disgust with this office environment and tried to tell them to just deal with their work and stop this intense interpersonal relations between the staff and stop this already.</p> <p>Q. So it's your testimony that you spoke to Matt, Lisa, Tricia, and Gregg in connection with this incident?</p> <p>A. Which incident?</p> <p>Q. The one that you just said, what Matt was saying, what Lisa was saying, what Gregg was saying, what -- you know, what Tricia saying. So did you -- you spoke to them all again after this email?</p> <p>A. I can't tell you exactly who I spoke to in every single case, but I went around and tried to</p>

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	<p style="text-align: center;">---</p> <p>1 collect information from the pertinent staff about 2 what was going on, and I could not figure it out. 3 This was not the case as of November of a lot of 4 people coming and saying roughly the same thing and 5 my taking action on it. This was a mess of 6 contradictions between virtually every person that 7 came to me. Disagreement on almost every topic. 8 Q. Tricia closes by saying, "I know that 9 everyone is concerned that Gregg is back to his old 10 ways, but I truly wanted to believe that he had 11 learned a lesson. The things I was told last night 12 make me believe otherwise," right? I read that 13 correctly? 14 A. You did. 15 Q. So did you do another investigation to 16 determine whether Gregg was back to his old ways? 17 A. What are his old ways? His old ways -- 18 Q. I think she's referencing the things that 19 got him thrown out of the office, no? 20 A. This -- frankly, I think Matt, who left -- 21 Matt -- we haven't talked about Matt. Matt's a good 22 man, but he had a difficult time, as explained the 23 other day in his deposition, and he wanted to be 24 director, and he was angry at Gregg way back in</p>	<p style="text-align: center;">---</p> <p>1 think Matt had various issues and had affections for 2 some and anger at others and was -- mind you, back 3 then, he was purveying all sorts of information, 4 some of it true, some of it not true. 5 Q. So you're [inaudible] that Matt lied? 6 A. Let me finish. 7 Q. Is that your conclusion, that Matt lied? 8 A. No, I'm not concluded. I'm talking. Man, 9 you're so impolite. I concluded -- 10 Q. This isn't a conversation, Mr. Pipes. 11 It's a question and answer session -- 12 MR. CAVALIER: I'll tell you what, I'm 13 gonna ask for a break while there's no question 14 pending because I need one. 15 MR. CARSON: There is no question pending, 16 and you're client's just waxing poetic. 17 MR. CAVALIER: Well, that's even better. 18 If there's no question pending, we can take a 19 break. 20 MR. CARSON: Perfectly fine. 21 THE VIDEOGRAPHER: All right. So both 22 counsels agree to a break and -- 23 MR. CARSON: -- Jon, maybe you could just 24 have a conversation with your client about</p>	
	Page 314		Page 316
	<p style="text-align: center;">---</p> <p>1 November. He was -- he wanted to be director. He 2 was annoyed with me for not making him director. I 3 told him on many occasions that he had a year in 4 which to prove himself, from November to November, 5 '18 to '19. Let him show me what he can do, and I 6 will consider it. By March, he had decided he 7 didn't wanna do that anymore. He was fed up. He 8 was displeased. He started all sorts of rumors. 9 [Inaudible]. The day he left, he gave me a call and 10 told me that Marnie wants to be director instead of 11 Gregg. Is it true? Is it not true? I don't know. 12 Did I do an investigation to it? No. These 13 statements, rumors, allegations were zooming all 14 around the place, and I was, on the one hand, very 15 fed up with them; on the other, I could not spend my 16 entire time looking into whether Marnie really does 17 wanna become director or not. I just -- 18 Q. We haven't seen any allegations against 19 Matt, only Gregg Roman. 20 MR. CAVALIER: Object to form. 21 BY MR. CARSON: 22 Q. Right? Why do you think Matt Bennett's 23 the problem, not Gregg Roman? 24 A. I think I just explained to you why I</p>	<p style="text-align: center;">---</p> <p>1 quickly getting through this. 2 --- 3 (Indistinguishable cross-talk.) 4 --- 5 THE COURT REPORTER: Luke, what time is 6 it? 7 THE VIDEOGRAPHER: The time is 4:49, and 8 we are off the record. 9 --- 10 (Whereupon there was a recess in the 11 proceeding from 4:49 p.m. to 5:08 p.m.) 12 --- 13 THE VIDEOGRAPHER: The time is 5:08 p.m. 14 Eastern Time, and we are now back on the 15 record. 16 BY MR. CARSON: 17 Q. Mr. Pipes, do you see this email to Lisa 18 Barbounis from you sent on June 5th, 2019? 19 A. Yep. 20 Q. You did tell Lisa in this email that she 21 could work on her own time on the Tommy Robinson 22 stuff, correct? 23 A. Yup. 24 Q. Yes?</p>	

	Page 317		Page 319
1	A. I did say it, yeah.	1	that?
2	Q. You did say it, yes? We can't hear you.	2	MR. CAVALIER: Object to form.
3	Is that what you said?	3	THE WITNESS: No, I don't see that. I see
4	A. Yes.	4	where she lied about taking her children to
5	Q. Do you know that Lisa Barbounis is a	5	Britain.
6	elected Republican official in Philadelphia?	6	BY MR. CARSON:
7	A. I learned this in this email. Yes.	7	Q. You don't see it?
8	Q. So she is allowed to do political work on	8	A. No, I don't. Now I see both. I see --
9	her own time, correct?	9	Q. "I leave it to your good sense not to get
10	MR. CAVALIER: Object to form.	10	entangled in anything MEF issues" [as read]. Do you
11	BY MR. CARSON:	11	see that?
12	Q. By nature of her being a public-elected	12	MR. CAVALIER: I'm gonna let the record
13	official, that's political, right?	13	reflect that you scrolled the document up so he
14	A. No.	14	could see the part you were referring to.
15	Q. No? Being an elected official is not	15	THE WITNESS: Now that you scroll the
16	political?	16	document up, I can see it, and I can also see
17	A. Serving as elected official is not	17	the lie that Lisa told me about taking her
18	political. It depends -- I mean, not necessarily.	18	children with her to the UK.
19	Depends what the office is. I don't know what the	19	BY MR. CARSON:
20	office --	20	Q. Right. I think we've already testified
21	Q. We can't hear you.	21	about that today.
22	A. I don't know what her office is. I don't	22	A. Thank you for pointing it out.
23	know if it's political or not.	23	Q. So on June 5th, 2019 there's an email from
24	Q. After you found out that she was an	24	Marnie Meyer, right?
	Page 318		Page 320
1	electred public official as a Republican, did you	1	---
2	tell her she had to stop doing that at any time?	2	A. Yep.
3	A. [Inaudible].	3	Q. And she tells you that she's disappointed
4	Q. I'm sorry. We can't hear you.	4	that conditions that were implemented after the
5	A. Go up, and you have my reply to her.	5	November 5th meeting with Gregg Roman weren't being
6	Q. Well, I'm just asking, did you ever tell	6	adhered to, correct?
7	her that she had to stop?	7	A. Wrong.
8	A. Go up, and you'll see my reply.	8	Q. Was she disappointed?
9	Q. I'm not referencing a document. I'm	9	A. There's no reference here to November --
10	asking you a question right now.	10	Q. Wasn't one of the conditions that he
11	A. I'm referencing a document.	11	wouldn't deal with the finances?
12	Q. What?	12	A. He -- his -- in November '18, yes; in
13	A. I'm referencing a document.	13	March '19, no.
14	Q. Well, that's not how it works.	14	Q. So isn't she upset? "Daniel, I am upset
15	A. Well, you just --	15	by your response due to the fact that you assured me
16	Q. Did you ever tell Lisa that she had to	16	that Gregg's continued employment with MEF would not
17	stop being an elected public official as a	17	involve finances" [as read]. Right? She's
18	Republican? That's my question. Yes or no? It's	18	complaining that the conditions for Gregg Roman's
19	just a yes or no question.	19	continued employment aren't being adhered to.
20	A. No.	20	That's what she's complaining about; isn't that
21	Q. And, actually, just to reiterate, on	21	right?
22	June 24th, which is document D000024, you told her,	22	A. That is correct, but it is not what I told
23	"I leave it in your good sense not to get entangled	23	her, as I explained above. Removed him from
24	in anything related to MEF issues," right? See	24	day-to-day finances; I did not remove him from the
			audit. I couldn't. There's no one else who can do

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1	it, and I told her that at all times, that Gregg has	1	THE WITNESS: She's simply repeating what
2	to do the audit.	2	she'd said a couple of days -- weeks before.
3	Q. Document No. 26 is the next document.	3	BY MR. CARSON:
4	Document 26 is another email. This one is dated --	4	Q. Yeah, exactly. She made another complaint
5	so now we have this number, too -- June 10th, 2019.	5	weeks before, right?
6	This is an email from Patricia McNulty to you,	6	A. Let's go back to that earlier complaint
7	correct?	7	now that you --
8	A. Yes.	8	Q. We're gonna stay on --
9	Q. Wanna take a minute and look at it?	9	A. No. I'm gonna bring up the other thing.
10	A. Okay.	10	Q. Nope, you're not.
11	Q. This is another complaint made after	11	A. Yes, I am.
12	November 5th, 2018 about Gregg Roman, correct?	12	MR. CARSON: All right. Then we're gonna
13	A. Wrong.	13	go off the record, all right? We're off the
14	Q. It's not?	14	record.
15	A. No.	15	THE VIDEOGRAPHER: Counsel, do we have an
16	Q. Okay. So when she says, "We agreed I do	16	agreement about whether or not we are off the
17	not report to Gregg but directly to you, as his	17	record?
18	continued abusive and deceitful behavior is more	18	MR. CAVALIER: No. I have no idea why
19	than I should have to endure." So she's not	19	we're going off the record.
20	complaining about Gregg Roman there?	20	MR. CARSON: Because your client decided
21	A. No. She's just giving her usual dislike	21	that he's gonna stop and look through his own
22	of Gregg at this point. It's not a complaint. Show	22	documents. We're not doing that on my time.
23	me a --	23	MR. CAVALIER: I don't remember him saying
24	Q. Abuse and deceit, that's just normal --	24	he wanted to look through other documents.
	Page 322		Page 324
1	---	1	---
2	---	2	MR. CARSON: What'd he just say?
3	(Indistinguishable cross-talk.)	3	MR. CAVALIER: That he wanted to relate
4	---	4	his answer back to the prior complaint --
5	BY MR. CARSON:	5	MR. CARSON: We're not looking at this
6	Q. Sorry?	6	document right now. We're not looking at
7	A. Show me a complaint.	7	previous documents.
8	Q. She's saying that he's -- "his continued	8	MR. CAVALIER: I'm not talking about a
9	abusive and deceitful behavior".	9	previous document. He just said -- you asked
10	A. Right. That's --	10	him a question about this, what you --
11	Q. Aren't you concerned that he's being	11	---
12	abusive and deceitful and that it's happening after	12	(Indistinguishable cross-talk.)
13	they reported him for sexual harassment?	13	---
14	MR. CAVALIER: Object to form.	14	BY MR. CARSON:
15	THE WITNESS: There is no allegation of	15	Q. You ready to continue, Mr. Pipes?
16	sexual harassment here.	16	A. When you let me speak.
17	BY MR. CARSON:	17	Q. There's no question pending. There's
18	Q. Do you know what retaliation is?	18	nothing for you to say.
19	A. I do.	19	A. I haven't finished my answer.
20	Q. It's an allegation of retaliation, right?	20	Q. There's no question pending.
21	MR. CAVALIER: Object to form.	21	A. I didn't finish my answer.
22	BY MR. CARSON:	22	Q. There's no question pending, Mr. Pipes.
23	Q. Does she have to use a magic word to	23	Okay. So we're gonna continue when you're ready.
24	complain about retaliation?	24	If you're not ready, we're gonna go off the record.
	MR. CAVALIER: Object to form.		Which one do you wanna do?

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1	A. I wanna finish my answer.	1	it if you can, Daniel.
2	Q. There's no question, Mr. Pipes. What are	2	THE WITNESS: I don't do legal things.
3	you gonna --	3	I'm a Middle East specialist.
4	---	4	BY MR. CARSON:
5	(Indistinguishable cross-talk.)	5	Q. Do you -- what does someone have to say in
6	---	6	order for it to be retaliation, in order for them to
7	MR. CARSON: Look, we're gonna go off the	7	report retaliation? What do they have to say to
8	record because I'm gonna get up and walk away	8	you?
9	and --	9	MR. CAVALIER: Same objection.
10	MR. CAVALIER: Are you withdrawing your	10	THE WITNESS: Hypothetical.
11	last question?	11	BY MR. CARSON:
12	MR. CARSON: There's no question pending.	12	Q. Mr. Pipes, you have to answer the
13	He wasn't answering a question.	13	question. What do they have to say to you?
14	MR. CAVALIER: Yes, he was.	14	A. Hypothetical. I do not know what they
15	MR. CARSON: All right. What's the	15	have to say to me.
16	question pending?	16	Q. Are you in charge of --
17	MR. CAVALIER: You're gonna have to ask	17	---
18	the court reporter since --	18	(Indistinguishable cross-talk.)
19	MR. CARSON: Go ahead. What's the	19	---
20	question?	20	THE WITNESS: Let me speak.
21	---	21	BY MR. CARSON:
22	(Discussion was held off the stenographic	22	Q. Mr. Pipes, you just said you're not
23	record.)	23	answering hypothetical. Are you in charge of
24	---	24	enforcing MEF policy to prohibit discrimination and
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1	---	1	---
2	THE COURT REPORTER: There's no question.	2	harassment in the workplace? Is that part of your
3	MR. CARSON: There's no question pending,	3	job responsibility?
4	so what are we doing, Jon?	4	A. When?
5	MR. CAVALIER: You asked a question	5	Q. Anytime between 2017 and the present. Has
6	before --	6	that been your job responsibility?
7	MR. CARSON: The court reporter just said	7	A. When we had someone in charge of human
8	there's no question pending.	8	resources, no. As the ultimate decision maker, but,
9	MR. CAVALIER: If you're acknowledging for	9	no --
10	the record that there's no pending question or	10	Q. Okay. You are the president of the Middle
11	you withdraw the question, we can --	11	East Forum, correct?
12	MR. CARSON: I'm not withdrawing the	12	A. Yes.
13	question because there's no question pending,	13	Q. So you are, quote, unquote, the ultimate
14	which now I've said it and the court reporter	14	decision maker?
15	said it. So are we ready?	15	A. Yeah, but I don't --
16	MR. CAVALIER: So ask the question.	16	Q. So you're aware of whether the Middle East
17	BY MR. CARSON:	17	Forum maintains a [unintelligible] --
18	Q. Are we ready to continue, Mr. Pipes?	18	THE COURT REPORTER: Sorry. Say that
19	A. If you let me finish my answer.	19	slower.
20	Q. There's no question pending, Mr. Pipes.	20	BY MR. CARSON:
21	There's nothing to be finished. Mr. Pipes, is there	21	Q. Are you aware of whether the Middle East
22	a magic word that people have to say in order to	22	Forum maintains a policy to prohibit retaliation?
23	report retaliation?	23	A. I am not.
24	MR. CAVALIER: Object to form. Object to	24	Q. You're not aware whether they have one?
	calling for a legal conclusion. You can answer		A. No.

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1	<p style="text-align: center;">---</p> <p>Q. Okay. That's fine. So, here, you're not concerned -- when Ms. McNulty says that there's continued abusive and deceitful behavior regarding Gregg Roman, you're not concerned that she might be reporting retaliation, correct, or are you?</p> <p>MR. CAVALIER: Object to form.</p> <p>THE WITNESS: When did I stop beating my wife? I'm not gonna answer those questions. I'm gonna give my answer.</p> <p>BY MR. CARSON:</p> <p>Q. No, you're not.</p> <p>A. I'm going to give you my answer --</p> <p>Q. If I ask a yes or no question, you don't get to just say whatever you want. That's not the way this works.</p> <p>MR. CAVALIER: Seth, when you load the question, it causes problems for the witness.</p> <p>BY MR. CARSON:</p> <p>Q. I'm asking you, are you concerned, when she reports continued abusive and deceitful behavior, that it implicates retaliation, yes or no? Are you concerned?</p> <p>MR. CAVALIER: Same objection.</p> <p>THE WITNESS: I'm not gonna answer a</p>	1	<p>retaliation? It's not a difficult question.</p> <p>MR. CAVALIER: That's not a question that you asked before.</p> <p>MR. CARSON: It's a yes or no question. It's simple.</p> <p>MR. CAVALIER: That's a different question --</p> <p style="text-align: center;">---</p> <p>(Indistinguishable cross-talk.)</p>
11	<p>BY MR. CARSON:</p> <p>Q. Yes or no, Mr. Pipes, were you concerned?</p> <p>MR. CAVALIER: You can answer that question, Daniel.</p> <p>THE WITNESS: No.</p> <p>BY MR. CARSON:</p> <p>Q. How about when she said, "It's more than I should have to endure"? Were you concerned about that?</p> <p>A. No, and I'll tell you why I was wasn't.</p> <p>Q. You don't have to. It was a yes or no question.</p> <p>A. I'm going to.</p> <p>Q. I didn't ask you why.</p>	11	<p>BY MR. CARSON:</p> <p>Q. How about when she said, "It's more than I should have to endure"? Were you concerned about that?</p> <p>A. No, and I'll tell you why I was wasn't.</p> <p>Q. You don't have to. It was a yes or no question.</p> <p>A. I'm going to.</p> <p>Q. I didn't ask you why.</p>
1	<p style="text-align: center;">---</p> <p>loaded question. I'll answer the question the way I wanna answer it.</p> <p>BY MR. CARSON:</p> <p>Q. You don't get to choose what questions you answer.</p> <p>A. I am. Either you wanna hear my answer, or you don't get an answer. Do it your way.</p> <p>MR. CARSON: All right. If your client's not gonna answer questions, we're gonna stop and file a motion, Jon, okay, because this is ridiculous.</p> <p>MR. CAVALIER: Seth, he's trying to answer your question --</p> <p>MR. CARSON: No, he's not. He's trying --</p> <p>MR. CAVALIER: -- questions that involve legal definitions. You're loading the questions by assuming that some kind of a report occurred. You're loading the questions by --</p> <p>MR. CARSON: Jon, I'm referencing an email that was sent from my client to him. The email says that there's continued abusive and deceitful behavior. My question is simple: Are you concerned that it might implicate</p>	1	<p>style="text-align: center;"&gt;---</p> <p>A. I'm going to tell you why.</p> <p>Q. No, Mr. Pipes. There's no question pending.</p> <p>A. Well, that's the next thing I'm gonna do is --</p> <p style="text-align: center;">---</p> <p>(Indistinguishable cross-talk.)</p> <p style="text-align: center;">---</p> <p>BY MR. CARSON:</p> <p>Q. Mr. Pipes, there's no question pending, and we're gonna stop the deposition, and we're gonna get -- I'm just gonna file a motion tomorrow and let him know that the witness was completely nonresponsive, refused to cooperate in a deposition, and I'm gonna ask to do another seven hours.</p> <p>MR. CAVALIER: Hey, Daniel, if he doesn't wanna hear you say why, he doesn't need to hear you say why. I mean, it's his loss, not yours.</p> <p>BY MR. CARSON:</p> <p>Q. So the next sentence in the email says, "The outline of this job description is also concerning due to Gregg's history of discrimination and harassment of female employees in the workplace. Can you even consider a female employee for this</p>

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	<p style="text-align: center;">---</p> <p>1 position knowing she will have to work closely with 2 Gregg Roman and report directly to him?"</p> <p>3 A. Tricia McNulty had proven herself to be a 4 liar. Why would I pay attention to all the things 5 she was saying?</p> <p>6 Q. When did she prove herself to be a liar, 7 Mr. Pipes?</p> <p>8 A. By saying different things about what 9 Gregg did, by changing her story. How can I believe 10 her?</p> <p>11 Q. Well, let me ask you a question. When did 12 you find out that she changed her story?</p> <p>13 A. On November 2nd. November 1st, she told 14 me one thing; November 2nd, she wrote me another 15 thing; and then, subsequently -- I don't remember 16 which date -- she came up with a third story.</p> <p>17 Q. You sure you wanna go with that testimony right now?</p> <p>18 A. I'm very sure.</p> <p>19 MR. CAVALIER: Object to form.</p> <p>20 BY MR. CARSON:</p> <p>21 Q. Okay, good. Didn't you testify today that 22 you just found out that she said the second thing on 23 November 2nd?</p>		<p>1 for the director of development. I didn't tell 2 her she should or should not. She decided she 3 wanted to apply, but she didn't like the terms 4 of it. Fine. It's --</p> <p>5 ---</p> <p>6 (Indistinguishable cross-talk.)</p> <p>7 ---</p> <p>8 THE WITNESS: -- with Marnie and the 9 others, I have to take everybody's wish and 10 make that my command.</p> <p>11 BY MR. CARSON:</p> <p>12 Q. Okay, Mr. Pipes. Thank you.</p> <p>13 A. Let me finish.</p> <p>14 Q. No, no. You don't have to finish.</p> <p>15 There's no question pending.</p> <p>16 MR. CAVALIER: No. This time, you asked a 17 question.</p> <p>18 MR. CARSON: No, I did not. We're not -- 19 Jon, he's not just gonna go on and wax poetic 20 during the next hour and a half. That's not --</p> <p>21 MR. CAVALIER: -- you asked him about 22 whether he considered her for the job and --</p> <p>23 BY MR. CARSON:</p> <p>24 Q. Did you consider her for the job, yes or</p>
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	<p style="text-align: center;">---</p> <p>1 MR. CAVALIER: Object to form.</p> <p>2 THE WITNESS: No.</p> <p>3 BY MR. CARSON:</p> <p>4 Q. No, you didn't? Okay. "Due to parameters 5 that are supposed to be in place concerning myself 6 and Gregg, I am wondering how it would be possible 7 for me to even be considered for this position." 8 Did you consider her for the position knowing that 9 she'd have to work with Gregg, yes or no?</p> <p>10 MR. CAVALIER: Object to form.</p> <p>11 THE WITNESS: It's a loaded question.</p> <p>12 BY MR. CARSON:</p> <p>13 Q. Did you consider her for the position?</p> <p>14 A. She would have been considered had she 15 applied, but this was simply the announcement of a 16 job, so how could I consider her before she applied?</p> <p>17 Q. She never told you she was interested in 18 the position?</p> <p>19 MR. CAVALIER: Object to form.</p> <p>20 THE WITNESS: She announces here that 21 she's interested in the position but doesn't 22 wanna work for Gregg, so she'd have to tell me 23 who the director of development is going to 24 report to. I didn't tell her she had to apply</p>		<p>1 no? It's a yes or no question.</p> <p>2 A. Not a yes or no question.</p> <p>3 Q. "Giving you" -- so what did you mean here 4 on June 9th, 2019? You wrote -- and this is 5 Document No. 26 -- "Giving you an advance look, 6 though small changes might still be made to it." 7 What's that mean?</p> <p>8 A. That means I gave her the courtesy, since 9 she was interested in the job, of seeing what the 10 description would be, but I wasn't taking orders 11 from Tricia on how to define the job. The job was 12 an administrative job. I am not the administrator, 13 and I thought that that job -- the person in that 14 job should report to Gregg, and that's what would 15 have been had we gone through with that job, which 16 we didn't because, shortly after this, she then did 17 the EEOC letter, and then we just -- I just stopped 18 it completely.</p> <p>19 Q. Thank you, Mr. Pipes. The next email is 20 on June 11th, 2019, and the document number is 21 000027, and in this email, she says, "Daniel, there 22 have been no new instances of sexual harassment 23 since November when Gregg was removed from the 24 office, but I was referring to the ongoing</p>

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	<p style="text-align: center;">---</p> <p>1 psychological harassment we discussed following his  2 phone call with Matt." So, here, she's reporting  3 ongoing psychological harassment, correct?  4 A. Correct.  5 Q. So that's three emails she sent to you  6 reporting Gregg's misconduct since November 5th,  7 2019, right?  8 A. No, wrong.  9 Q. Not three emails?  10 A. She's reporting what she heard from Matt.  11 She didn't hear it from Gregg. She heard Matt's  12 version of what Gregg said. What Gregg said he said  13 and what Matt said he said were different, so I  14 don't know what the truth was.  15 Q. So you disregarded her email, correct?  16 MR. CAVALIER: Object to form.  17 THE WITNESS: -- regard it. I can't take  18 every single statement of someone and rearrange  19 the office at their convenience. We had an  20 agreement -- one in November, and a second  21 agreement in March -- and they were all gunning  22 for each other's jobs. They were hating and  23 loving and engaged with each other in all sorts  24 of complex ways, and here she goes on about</p>	<p style="text-align: center;">---</p> <p>1 BY MR. CARSON:  2 Q. She said that it happened following the  3 phone calls with Matt.  4 A. She had no direct contact with Gregg. She  5 had contact with Matt, who she had a great affection  6 for, and Matt had a relationship with Gregg which  7 was complex, and the three of them went from Gregg  8 to Matt -- maybe Gregg to Matt, and Matt,  9 definitely, to Tricia. I --  10 Q. The email continues, "Gregg continues to  11 be the director, a position of power and authority,  12 which will always be detrimental to my ability to be  13 successful here. Even though I report to you, I am  14 still receiving directives and deadlines to be met  15 by Gregg. For all intents and purposes, I am still  16 held accountable to him." Right? That's what she  17 said to you?  18 A. That's what she said, and that's what she  19 agreed to back in March.  20 Q. "You have stated that you highly dislike  21 the administrative part of running a think tank,  22 which you were forced into taking over when Gregg  23 was removed from the office in November. That being  24 said, my reporting to you as director of development</p>	<p style="text-align: center;">---</p>
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	<p style="text-align: center;">---</p> <p>1 what Matt said on a telephone call after Matt  2 had left the office. Why is Matt reporting to  3 her what Gregg allegedly said after he left the  4 office?  5 BY MR. CARSON:  6 Q. Her email continues, "He has continued to  7 spew slander regarding my work and my reputation.  8 He has a history of speaking badly about employees  9 to other employees and, as was the case in April, to  10 former employees. It is very hard to work with  11 someone knowing he is trying to damage my reputation  12 and find a way to push me out of a job." So  13 considering these -- the June 11th, 2019 email from  14 Patricia McNulty to you, did you consider that a  15 report of retaliation?  16 A. Course not. I consider it a report of  17 what Matt is telling her.  18 Q. But she doesn't say this is what Matt --  19 she's just saying to you --  20 A. Yes, she does. "Following his phone calls  21 with Matt." She got it from Matt.  22  23 (Indistinguishable cross-talk.)  24</p>	<p style="text-align: center;">---</p> <p>1 would already put me at a disadvantage in my  2 application pool since it would not alleviate your  3 oversight of administrative tasks. Additionally, if  4 Gregg is part of the hiring process for the director  5 of development, I am even further disadvantaged,  6 despite my experience and accomplishments, knowing  7 full well he has already stated that he considers  8 Marnie, Lisa, and me 'usurpers'." That didn't come  9 from Matt, did it?  10 A. You tell me. I don't know where it came  11 from.  12 Q. Did you investigate it?  13 A. You want me to full-time investigate every  14 single email I get?  15 Q. No. Every single report of --  16 A. We went through all of this in November.  17 I devoted a week to it. I moved on.  18 Q. Right. You moved on, but they didn't,  19 correct?  20 A. Oh, no. They were building their case.  21 We have perfect example of Tricia here building her  22 case to take to Derek Smith Law Group and sue us for  23 \$31 million. Good job, Tricia. Good job,  24 Mr. Carson. Well done.</p>	<p style="text-align: center;">---</p>

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1	---	1	it. I'm trying to do my work, and these people are
2	Q. This is what you intend to tell a jury? This is how you're gonna testify?	2	engaged in this backstabbing, including Matt, I'm
3	A. They agreed. They agreed to what we set	3	sorry to say. Matt was part of it. Matt was part
4	up in November, they agreed to the changes in March,	4	of this backstabbing, and I don't know why he did
5	and then, all of a sudden, in late May, early June	5	it. He left the organization. I don't know why he
6	or so, suddenly comes barrage of calumny against	6	was doing it. I don't know [inaudible] Marnie
7	Gregg out of nowhere. Did he do anything? Did he	7	wanted to be the head of it. I don't know why he
8	do anything? All we know is that Matt said some	8	was trying to get Tricia upset about Gregg. I don't
9	things, quoted Gregg to Tricia. We know of no	9	know why. I don't know. Oh, and let me note that
10	complaints that he actually did anything. We have	10	you asked about the rumor, the Brady rumor.
11	generalizations about what a miserable person he is,	11	Q. Yeah. There's no question pending about
12	how she doesn't like him. Okay. So what am I	12	the Brady rumor.
13	supposed to do, change the whole organization all	13	A. I now remember that the Brady -- I asked
14	over again because Tricia is saying these things?	14	Lisa, is this new? Is this since November? She
15	Q. No, of course not, right? You didn't even	15	said no. Predated November. So --
16	think about doing that, correct? Right? That's a	16	Q. Mr. Pipes, did you hire a deputy director?
17	question.	17	A. [Inaudible] --
18	---	18	Q. No, I'm not. You're not gonna finish, Mr.
19	(Indistinguishable cross-talk.)	19	Pipes. You're done, okay? Were you gonna hire a
20	---	20	deputy director?
21	BY MR. CARSON:	21	---
22	Q. Right? Hello? There's a question	22	(Indistinguishable cross-talk.)
23	pending, Mr. Pipes.	23	---
24	A. I've answered you.	24	THE WITNESS: -- to me in April.
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1	---	1	Actually, it took place before November, and it
2	Q. No. My last question is, did you even	2	was a quiver in their satchel, which they
3	consider doing that, making changes to the	3	brought out --
4	organization to protect the female employees who	4	MR. CARSON: Jon, you gotta get your
5	worked for you?	5	client under control. I don't even know what
6	MR. CAVALIER: Object to form.	6	he's talking about right now.
7	THE WITNESS: I made extensive changes to	7	MR. CAVALIER: So you do not want the
8	the organization in November --	8	witness to correct prior testimony?
9	BY MR. CARSON:	9	MR. CARSON: I have no idea. He's just
10	Q. In November.	10	been going on for the last five minutes. I
11	A. -- approval. I made further changes in	11	don't think anyone here knows what he's talking
12	March with their initiation and approval. I could	12	about, so, please, get your client under
13	not make, in every month, a whole new range of	13	control. He's not answering a question right
14	changes because someone doesn't like someone.	14	now. He's just going on and on and on, and,
15	Here's something from someone else that someone	15	seriously, I'm gonna file a motion about it
16	said. This was a viper's nest, and if I thought so	16	because it's ridiculous. It's just ridiculous.
17	then, I think so more and more as I've read the	17	It's not okay. You can't intentionally try to
18	exchanges of emails between these people and the	18	sabotage a deposition by answering yes or no
19	things about they were saying -- things they were	19	questions by taking five minutes and going on
20	saying about each other, things they were saying to	20	and on and on just babbling about nothing.
21	each other, the things they were saying about	21	He's not responsive to anything right now.
22	others, incredible. So I hope you don't raise this,	22	MR. CAVALIER: It should go without saying
23	Mr. Carson, because it's just gonna raise a viper's	23	that we disagree with the way you describe
24	nest of contention, ugliness, vulgarity, sexual	24	that. If you wanna file a motion --
	accession. It's nasty stuff, and I was not part of		

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1	<p>---</p> <p>1 MR. CARSON: You don't have a choice, but 2 that's what's happening, and I think the record 3 will speak for itself, okay?</p> <p>4 MR. CAVALIER: To the extent the record 5 can speak at all, to the extent you've 6 interrupted the witness 500 times, and the 7 court reporter has been put through hell during 8 these six hours --</p> <p>9 MR. CARSON: We're gonna move on.</p> <p>10 MR. CAVALIER: -- we'll see what it looks 11 like but --</p> <p>12 MR. CARSON: We're gonna move on now.</p> <p>13 BY MR. CARSON:</p> <p>14 Q. Mr. Pipes, you told -- you talked about 15 hiring a deputy director. Did you ever do that, yes 16 or no?</p> <p>17 A. No.</p> <p>18 Q. See this email from Lisa on July 18, 2019, 19 Mr. Pipes?</p> <p>20 A. Yeah.</p> <p>21 Q. She talking about attending, I think, a 22 conference in Washington D.C.; is that right?</p> <p>23 A. I don't know.</p> <p>24 Q. What?</p>	<p>1 A. Apparently.</p> <p>2 Q. So here's another email from Ms. McNulty 3 dated May 10th, right? May 10th, 2019, all right?</p> <p>4 This one, she says, "Daniel, I feel very 5 uncomfortable in the situation I find myself now in. 6 When Gregg was removed from the office the first 7 time, I continued to work with him regularly. His 8 role keeps him involved in events and fundraising, 9 essentially working hand-in-hand with me." So she's 10 telling you that, even after Gregg was ejected from 11 the office, she still had to work with him, correct?</p> <p>12 A. No.</p> <p>13 Q. Not what she's saying there?</p> <p>14 A. No.</p> <p>15 Q. Says, "When Gregg was removed from the 16 office the first time". Is she referring to the 17 November 5th, 2018 situation when he was removed 18 from the office there?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. She said, "I continue to work with 21 him regularly," right?</p> <p>22 A. Yes.</p> <p>23 Q. So then why'd you say no a minute ago?</p> <p>24 MR. CAVALIER: Objection.</p>	<p>---</p>
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1	<p>---</p> <p>1 A. I don't know.</p> <p>2 Q. Marc writes, "Dear Lisa, as you well know, 3 [unintelligible] no surprises when it comes to 4 activities that could embarrass the organizations, 5 especially political activities. As you know, 6 Daniel Pipes previously confronted you about your 7 surprise travels, first on April 17th about your 8 meeting in D.C. with Jack Posepiak [phonetic], then 9 on May 28th about your travels to the UK." Do you 10 remember?</p> <p>11 A. I read it, yeah.</p> <p>12 Q. So she responds and says, Please see the 13 attached screenshot. I asked Dr. Pipes for 14 permission, and he granted it. So she did talk to 15 you about going to that conference in D.C., right, 16 and you said okay?</p> <p>17 MR. CAVALIER: Object to form.</p> <p>18 THE WITNESS: This is a letter from Marc 19 to Lisa, and from Lisa to Marc. I'm not quite 20 sure what we're supposed to...</p> <p>21 BY MR. CARSON:</p> <p>22 Q. I'm asking you if you -- she says that you 23 gave her permission to go. She asks, and you 24 granted permission; is that true?</p>	<p>---</p> <p>1 THE WITNESS: Because there's 2 communication that the next sentence is about 3 the pre-March era.</p> <p>4 BY MR. CARSON:</p> <p>5 Q. All right. So we'll read that, then. 6 "Everyone else here [sic] received a reprieve from 7 him, but I did not." She's referring to between 8 November 5th, 2018 and March 2018. She's saying, 9 even during that time period, I didn't get a 10 reprieve, right?</p> <p>11 MR. CAVALIER: Object to form.</p> <p>12 BY MR. CARSON:</p> <p>13 Q. Is that how you understand it?</p> <p>14 A. Understand what?</p> <p>15 Q. What she wrote to you. I'll continue. 16 "Everyone else received a reprieve from him, but I 17 did not. With him returning to that role, I will 18 again continue to be working with him just as much 19 as ever. I had very much wanted to believe that he 20 had learned a lesson and could be brought back 21 because I knew it would make your life better, but I 22 was wrong," right? "Now I find myself again on the 23 very bad side of Gregg, who remains in power. 24 Despite splitting that power into two parts, it is</p>	<p>---</p>

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1	<p style="text-align: center;">---</p> <p>still -- it is still a position of power that could directly affect my career and future. There will never be a day when Gregg doesn't think it would be in his best interest to not have me at MEF. Between the sexual harassment, the verbal abuse, and the slander of my character and reputation that has all been made known, he will force me out of the Forum the second he has an opportunity. I witnessed him drive Eman, Grayson, and Gary out of employment at the Forum because he didn't want to be working with them. He will back me into a corner until I have no choice to leave, like each of them" [as read]. She is complaining to you after November 5th, 2018, correct?</p> <p>A. She got in touch with a shoddy lawyer who told her to start documenting how terrible everything was, and she did that, and a few days later, she filed an EEOC complaint. Yes.</p> <p>Q. What lawyer did she get in touch with by May 10th, 2019?</p> <p>A. Perhaps yourself, perhaps another one.</p> <p>Q. I'll represent to you she didn't get a lawyer by May 10th, 2019.</p> <p>A. She was on her way to getting a lawyer.</p>	<p style="text-align: center;">---</p> <p>would cause him to be fired, that he did something that was terrible. There are vague things about Gregg --</p> <p>Q. My question was, she did complain again, correct?</p> <p>A. I'm answering it --</p> <p>Q. No, you're not. My question was, did she complain again? That's the question, Mr. Pipes. It's yes or no or "I don't know". You're allowed to say "I don't know," too. Did she complain again? Is this another complaint?</p> <p>A. I am not gonna answer your loaded question.</p> <p>Q. You have to answer the question.</p> <p style="text-align: center;">---</p> <p>(Indistinguishable cross-talk.)</p> <p style="text-align: center;">---</p> <p>BY MR. CARSON:</p> <p>Q. -- say whatever you want to my questions. It's a yes or no question. Did she complain again? Is this a complaint?</p> <p>MR. CAVALIER: He's trying to give you the context --</p> <p>MR. CARSON: No. I'm not asking for</p>	<p style="text-align: center;">Page 352</p> <p style="text-align: center;">---</p> <p>context. I'm asking a yes or no question.</p> <p>BY MR. CARSON:</p> <p>Q. Did she complain again?</p> <p>A. No.</p> <p>Q. She didn't -- this is not a complaint, right?</p> <p>A. No.</p> <p>Q. Okay. So we've now looked at a complaint on April 23rd, 2019, one on June 10th, 2019, one on June 11th, 2019, and one on May 10th, 2019. They're all from Patricia McNulty. Do you remember that today?</p> <p>A. No. I --</p> <p>Q. You don't remember?</p> <p>A. I said no, I do not remember. I do not see complaints. I see moaning about Gregg. I do not see any complaints, anything for me to act on.</p> <p>Q. That's what Patricia McNulty's doing, she's moaning about Gregg?</p> <p>A. That's what she's doing.</p> <p>Q. Okay. Thank you.</p> <p>A. Not providing me with any specifics that I can act on.</p> <p>Q. I understood your answer. Mr. Pipes --</p>
1	<p style="text-align: center;">---</p> <p>She was the one who went first to a lawyer, and you are the lawyer, I believe, and she was setting up her argument. Note that these all came late in the day just before the EEOC complaint. Gregg never tried to get rid of her. This is --</p> <p>Q. So this is part of the conspiracy, right, the huge conspiracy that you've concocted?</p> <p>A. The conspiracy you've concocted, yes.</p> <p>Q. "I honestly do not know what I am supposed to do in this position. Like I said to you before, I feel like I am in a lose-lose situation. I do believe that speaking to a lawyer is in my best interest." She hadn't gone to a lawyer, right? She's thinking about it right now.</p> <p>A. [Inaudible].</p> <p>Q. What?</p> <p>A. Preparing the way to go to a lawyer.</p> <p>Q. Preparing the way to go to a lawyer, okay. But the point is she did complain about Gregg again, correct?</p> <p>A. Well, it's the same point she's making in slightly different words over and over again, but not -- at no point after November was there any specific allegation that Gregg did something that</p>	<p style="text-align: center;">Page 350</p> <p style="text-align: center;">---</p>	

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1	---	1	old -- it's the old issues.
2	---	2	Q. But you didn't investigate this rumor in
3	(Indistinguishable cross-talk.)	3	2018 because you didn't know about it, right?
4	---	4	A. -- know about it, but when I asked Lisa --
5	MR. CARSON: There's no question on the	5	Q. I'm sorry. Did you say you did not know
6	table.	6	about it?
7	MR. CAVALIER: He's finishing his answer.	7	A. I did not know about it until spring --
8	MR. CARSON: No, there's no question. All	8	I'm not sure when -- of 2019, and when I heard about
9	right. So right now we are going to look at --	9	it, the most important thing to me was when did this
10	and, by the way, that was -- the last complaint	10	take -- when did she hear about this?
11	we looked at was on -- was D000037.	11	Q. Yeah.
12	MR. CAVALIER: I'm objecting to the --	12	A. When she heard about -- let me finish.
13	---	13	She said she heard about it before November '18, and
14	(Indistinguishable cross-talk.)	14	that made me less anxious about it because whoever
15	---	15	had initiated it, it took place in the previous era,
16	THE COURT REPORTER: Nothing is getting	16	and we are now out of that. So I don't know --
17	written down when you're talking at the same	17	Q. Yeah. That's because you gave Gregg
18	time.	18	immunity for everything that happened before
19	MR. CARSON: That's okay. I'm just	19	November 2018, right?
20	letting the court reporter -- I'm sorry -- the	20	A. I what?
21	videographer know what exhibits we're at.	21	Q. You gave him immunity. You gave him a
22	BY MR. CARSON:	22	reprieve. If it happened before that, you weren't
23	Q. So the next thing we're gonna look at	23	interested.
24	is -- so this is a email where -- do you remember	24	MR. CAVALIER: Object to form. Object as
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1	---	1	---
2	A. No.	2	argumentative.
3	MR. CAVALIER: Object to form.	3	THE WITNESS: No, I did not give immunity.
4	BY MR. CARSON:	4	I severely curtailed his hour, his
5	Q. She's saying Gregg -- you see right here,	5	remuneration, and other aspects of his job.
6	"Gregg has made it clear he has hostilities toward	6	BY MR. CARSON:
7	me and he now -- and is now known to have started	7	Q. You've already testified about that.
8	rumors about me, damaging my reputation, for which	8	---
9	he has not even been held accountable in any manner,	9	(Indistinguishable cross-talk.)
10	including a simple apology" [as read]. Right?	10	---
11	She's complaining there, correct?	11	THE WITNESS: -- can't just interrupt me.
12	A. No.	12	BY MR. CARSON:
13	Q. Okay. So now that's -- you said there	13	Q. It was another yes or no question. That's
14	wasn't one complaint against Gregg Roman after	14	it, yes or no. Mr. Pipes, what about this? Here,
15	November 5th, 2019, and I would represent to you	15	there's another -- there's another sentence here.
16	that we've now looked at at least seven, but you're	16	Besides the rumor about Marnie Meyer, she says,
17	saying none of them are complaints, correct?	17	"Gregg has made it clear that he has hostilities
18	A. This was a complaint about something that	18	toward me". That's present tense, correct?
19	happened before November 2018.	19	A. I will answer my way, or I don't answer.
20	Q. That you found out about after --	20	Q. I mean, I'm asking you if she's talking in
21	A. I asked Lisa when she told me about this	21	the present tense.
22	Brady rumor, was this pre or post November '18, and	22	A. I will answer as I wish to answer, and
23	she said pre. So this is from before. It is not a	23	you'll let me answer.
24	new complaint. It is raising the same old	24	Q. It's a simple yes or no question -- is she
	complaints in a new way, or at a new time, as the		talkin

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1	Yes, no, I don't know? 2 A. You gonna let me answer? 3 Q. I'm asking you a question, if you can 4 answer my question. Is she talking in the present 5 tense right here? 6 A. Are you gonna censor me or gonna let me 7 speak? 8 Q. I'm not censoring you. I'm asking you a 9 question. You can answer my question. Is she 10 talking in the present tense? This is a present 11 complaint, correct, or did you not see it that way? 12 It's just a yes or no question. 13 A. I would like to answer my way. 14 Q. Is your way include saying yes or no? 15 MR. CAVALIER: Seth, just let him answer 16 the question. 17 MR. CARSON: No, I'm not, because he 18 answers every single question by not answering 19 the question and just talking and talking and 20 talking. 21 MR. CAVALIER: We deposed your client a 22 week ago, and she went on for pages. 23 24 (Indistinguishable cross-talk.)	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	--- MR. CARSON: We're gonna go off the record because, I mean, he's just not answering right now. So I'm gonna stop sharing -- MR. CAVALIER: Ask the question, Seth. MR. CARSON: Is it a present tense sentence? MR. CAVALIER: Answer the question in the way you think it needs to be answered. MR. CARSON: I mean, at this point it doesn't matter what happens. We're just gonna have to deal with it with the court because you guys are what's wasting a lot of time today with nothing, and it's really -- you know, it's obviously a strategy. It's not a good strategy, but, you know, I'm objecting to the nonresponsiveness throughout the entire day. BY MR. CARSON: Q. Mr. Pipes, are you gonna continue the deposition, yes or no? A. Yes, if you let me speak. Q. Well, you can speak all you want, but your responses and what you say have to be in answer to my question. You can't just say whatever you want to anything I say.
1	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Page 358	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24
1	--- --- MR. CARSON: Are you guys gonna give me eight and a half hours today? I'll let him answer whatever he needs to, however long he needs to. MR. CAVALIER: You didn't give us eight -- MR. CARSON: Yeah, I did. I gave you eight and a half hours. MR. CAVALIER: Secondly, if you wanna ask questions that require context, he's allowed to give it. --- (Indistinguishable cross-talk.) --- MR. CAVALIER: -- far further along if you would stop interrupting him and just let him -- MR. CARSON: No, we wouldn't. My question, Jon, is if this is a present tense sentence. That's the question. Is it in the present tense? That's all I'm asking. BY MR. CARSON: Q. Do you know, Mr. Pipes, whether this is in present tense? A. You gonna censor me or let me speak?	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	--- MR. CAVALIER: He's not. He's trying to answer your question. BY MR. CARSON: Q. Okay. So my question here with regard to this email -- I'm not -- this is the last time I'm gonna try this. My question here with regard to this email is, do you see here right here where it says, "Gregg Roman has made it clear that he has hostilities toward me"?" A. You gonna box me in to one-syllable answer or -- Q. Do you see that? A. No, I don't see it. Q. You don't see it? I just highlighted it. MR. CAVALIER: The document's not up. BY MR. CARSON: Q. Do you see it now? "Gregg Roman has made it clear that he has hostilities toward me." A. I see it. Q. Okay. Isn't she talking in the present tense there? A. You gonna let me answer? Q. It's just a yes or no. MR. CAVALIER: I'm gonna object to the

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1	<p style="text-align: center;">---</p> <p>form. The document speaks for itself, and it's literally not in the present tense, and you keep asking --</p> <p>MR. CARSON: "Gregg has made it clear" -- then he can say no, can't he?</p> <p>THE WITNESS: No, it's not in the present tense.</p> <p>BY MR. CARSON:</p> <p>Q. Okay. So you think when she was saying this she was talking about the Caitriona Brady situation?</p> <p>A. "Has made" is past tense. "Has" is present tense.</p> <p>Q. Okay. Thank you for answering.</p> <p>A. Therefore, it is not a single-word answer.</p> <p>Q. All right. Your answer was no. Do you think that when she said -- do you think when she said this she was referring to the Caitriona Brady rumor, or you think she was talking about continued hostilities?</p> <p>A. It goes on to mention the rumor, but, of course, we now know that the rumor actually dated from a half year earlier.</p> <p>Q. But doesn't she say, "Gregg Roman made it</p>	1	<p style="text-align: center;">---</p> <p>A. You tell me.</p> <p>Q. Well, I'm asking. You're the one who said it. Marnie -- this is your email, right, Daniel Pipes to Marnie Meyer?</p> <p>A. That's my email from a year and a half ago. I don't recall. You have the list of -- you have the documents. I don't.</p> <p>Q. I can't -- we can't hear you, Mr. Pipes. Can you speak up? Here, you say, "I understand your feelings and sympathize with them and respect your reluctance. Gregg has made many -- made errors and many of -- Gregg has made errors, and many of us, including myself, have issues with what he has done. Accordingly, he has a diminished standing at MEF, including severely limited access to the office. You are not asked to be alone with him, you do not report to him, and he has no say over your employment duties or status" [as read]. Sent that on June 5th, 2019, right? Can you hear me?</p> <p>A. Yep.</p> <p>Q. You sent that on June 5th, 2019, correct?</p> <p>A. Correct.</p> <p>Q. Okay. You also write, "Gregg Roman has had -- has had many errors" [as read], correct?</p>
1	<p style="text-align: center;">---</p> <p>clear that he has hostilities and is now known to have started rumors against me" [as read]? Isn't that two things?</p> <p>A. Well, they're obviously connected because she mentions one right after the other, and so she's referring to something --</p> <p>Q. Mr. Pipes, you answered the question.</p> <p>A. -- six months earlier, pre November '18.</p> <p>Q. Okay. So the next thing we're gonna look at is -- who said this right here? The bane of my -- "This tension is the bane of my life," right? You forwarded Marnie's email complaining about Gregg to Gregg, and then said, "This tension is the bane of my life," right?</p> <p>A. Right.</p> <p>Q. Your key statement below is, "I'm no longer comfortable with Gregg reviewing or having access to my work product or your resulting refusal to work with him" [as read]. That was in connection to the finances, right?</p> <p>MR. CAVALIER: Object to form.</p> <p>BY MR. CARSON:</p> <p>Q. Was that -- what was that in connection to, Mr. Pipes?</p>	1	<p style="text-align: center;">---</p> <p>A. Correct.</p> <p>Q. What are the errors you're referring to there?</p> <p>A. Pre November '18.</p> <p>Q. But you also say, you have to work with Gregg Roman, correct?</p> <p>A. Correct.</p> <p>Q. So you're forcing her to work with him after November 5th, 2019 -- 2018, correct?</p> <p>MR. CAVALIER: Object to form.</p> <p>BY MR. CARSON:</p> <p>Q. You're forcing her to work with him, correct?</p> <p>MR. CAVALIER: Same objection.</p> <p>BY MR. CARSON:</p> <p>Q. I mean, "You have to work with Gregg Roman." That's what you said?</p> <p>A. I'm not forcing her. She is free to --</p> <p>Q. Can't hear you.</p> <p>A. No, I'm not forcing her.</p> <p>Q. I mean, if she wants to continue her employment, she has to, right?</p> <p>A. Correct.</p> <p>Q. What?</p>

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1	A. Yes.	1	BY MR. CARSON:
2	Q. Okay.	2	Q. [Unintelligible]. You already testified
3	THE VIDEOGRAPHER: Counsels, we are in the	3	to that, right?
4	last 60 minutes until seven hours, for your	4	MR. CAVALIER: Object to argumentative
5	information.	5	nature of the question. To the extent you can
6	MR. CARSON: So the next thing we're gonna	6	answer, you can answer.
7	look at is November -- is Documents 50, 51, 52.	7	BY MR. CARSON:
8	THE VIDEOGRAPHER: Thank you.	8	Q. Why are you trying to compare the -- why
9	MR. CARSON: Got it?	9	are you trying to relate Gregg Roman going rogue and
10	---	10	signing up with a \$200,000 health insurance policy
11	(Indistinguishable cross-talk.)	11	for the office, and what you did in response to
12	---	12	that, to this document?
13	MR. CARSON: What?	13	MR. CAVALIER: Object to form.
14	THE VIDEOGRAPHER: Yes, Counselor.	14	THE WITNESS: The complaints in November
15	BY MR. CARSON:	15	fell into two categories, the sexual complaints
16	Q. November 6, 2018. You see this? Is this	16	and the management complaints. The sexual
17	the agreement between you and Gregg Roman for him to	17	harassment complaints I dealt with by excluding
18	continue working with the Middle East Forum after	18	him from the office and limiting his contact
19	November 5th, 2018 meeting?	19	with the female employees. The administrative
20	A. Looks like it, yeah.	20	and management complaints I dealt with by
21	Q. So he keeps his -- keeps his title as	21	taking him out of administration. They're two
22	director, correct?	22	separate problems which I dealt with in two
23	A. Looks like it.	23	separate ways, and the -- I initially kept the
24	Q. Yeah?	24	remuneration the same, and benefits, and then
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1	---	1	---
2	A. Yep.	2	when I learned shortly afterwards that he had
3	Q. He continues to make the same amount of	3	\$27,000 or so in health insurance, we were
4	money, no -- all his benefits are the same, correct?	4	paying -- the Forum was paying \$27,000 a year
5	A. No. No, I said.	5	in health insurance. I took that away, so, in
6	Q. "Your salary and benefits remain	6	fact, he did have a significant loss of income.
7	unchanged." Isn't that part of the agreement?	7	BY MR. CARSON:
8	A. No.	8	Q. But he didn't have a significant loss
9	Q. Well, it says so right here, though,	9	because of the women's complaints, right? The loss
10	right?	10	of the health insurance was connected to his own
11	A. Yeah, but that isn't what happened.	11	misconduct, correct?
12	Q. Well, what happened that's different than	12	A. No, it was not misconduct. It was bad
13	that?	13	management.
14	A. I learned that he had, I think, \$27,000 in	14	Q. His own bad management, right?
15	health insurance, and I took that away.	15	A. Yes.
16	Q. But that has nothing to do with this,	16	Q. Okay. So the next thing we're gonna look
17	though, right?	17	at is an email from Lisa Barbounis to you. "Gregg
18	A. When I found out about that, I took it	18	Roman will be restated -- will be reinstated as
19	away. That was --	19	director of MEF" -- and this is Document 54. "He
20	Q. It has nothing to do with the conditions	20	will maintain responsibility for projects,
21	that you imposed upon Gregg because of all the women	21	developments, and communications, anything
22	coming forward and reporting sexual harassment,	22	content/production related. He will have no
23	discrimination, and harassment, correct?	23	oversight over finance operations. His position as
24	MR. CAVALIER: Object to form. Object to	24	director will remain probationary" [as read] -- so,
	lack of foundation.		here, Lisa is saying that his position is

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1	----- probationary, too, right?	1	----- really germane. In the case of the Gregg, Matt,
2	A. Yes. That was public. His -- he was on	2	Tricia, I threw up my hands, and I couldn't get to
3	probation.	3	the bottom of it and figured, you know, we're just
4	Q. And while he's on this probationary	4	gonna live with this.
5	status, there have been -- there were multiple	5	Q. Marnie was against Gregg Roman returning
6	emails to you complaining about his conduct and --	6	from the beginning, correct?
7	is that correct?	7	A. Correct.
8	MR. CAVALIER: Object to form.	8	Q. All right. So we're gonna look at a
9	THE WITNESS: No.	9	document that's marked 60 -- 00060, and that
10	BY MR. CARSON:	10	document says -- so here you're talking to Lisa
11	Q. While he was on probationary status, he	11	Barbounis, and this is on June 5th, 2019, and you're
12	received multiple emails complaining about Gregg	12	talking to her about the article in The Guardian,
13	Roman's misconduct, correct, or not correct?	13	and you were concerned about the possible
14	MR. CAVALIER: Object to form.	14	consequences that -- because of, you know, while she
15	THE WITNESS: Not correct.	15	was on her own time, it might be misconstrued as
16	BY MR. CARSON:	16	political activity from the Middle East Forum. So
17	Q. Sorry?	17	you say that although the trip was for fun -- strike
18	A. Not correct.	18	that. You say -- excuse me. You say, "The article
19	Q. It was just moaning, those emails, right?	19	could entirely disappear, but it could pop up in the
20	MR. CAVALIER: Object to form.	20	future," right?
21	THE WITNESS: -- same old thing and	21	A. Yep.
22	preparing --	22	Q. Which one happened?
23	BY MR. CARSON:	23	MR. CAVALIER: Object to form.
24	Q. Wait, wait. Did you say "same old	24	BY MR. CARSON:
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1	----- moaning"? Is that how you started the response?	1	----- Q. Did it entirely disappear, or did it pop
2	A. You gave several examples of Tricia	2	up in the future?
3	repeating herself, giving no specifics other than	3	A. No, it didn't, either. Where do you see
4	what Matt allegedly said to her. And, otherwise,	4	that, the "pop up in the future"? I'm not seeing
5	it's gearing up for lawsuits.	5	that.
6	Q. They were just moaning and conspiring,	6	Q. Is it down on this one?
7	right?	7	[Unintelligible] -- "This rates as both a surprise
8	A. Well, there are no specifics. In	8	and an unwelcome complication. The article could
9	November, I had specific after specific about money,	9	entirely disappear, but it could also pop up in the
10	about misuse of authority and the like. Here, it	10	future and make trouble for us." Did it ever pop up
11	was moaning. It was saying, Gregg doesn't like me.	11	and make trouble for you?
12	Gregg doesn't want me here. Gregg this, Gregg that,	12	A. No.
13	but there's nothing specific, nothing for me to --	13	Q. It entirely disappeared, right?
14	Q. Did you schedule any meetings to ask them	14	A. No.
15	for specifics?	15	MR. CAVALIER: Object to form.
16	A. My door was open. My emails were open.	16	BY MR. CARSON:
17	My texts were open. If you've got any problems with	17	Q. Sorry?
18	Gregg, tell me. And they did. You have been going	18	A. No.
19	through them. They did, but I look at them and say,	19	Q. Well, what happened?
20	I don't see specifics here. And when I did see one	20	A. It's there on the record and available to
21	specific about the Gregg, Matt, Tricia thing, and	21	those who wish to make trouble for us.
22	when I saw another one with the rumor thing, I	22	Q. But it's been a year and a half, and none
23	looked into them, and, in the rumor, I concluded it	23	of that trouble's happened, right?
24	took place a half year earlier and, therefore, not	24	A. No. There was trouble. We had trouble in

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	<p style="text-align: center;">---</p> <p>1 Britain.</p> <p>2 Q. What was the trouble related to the</p> <p>3 article?</p> <p>4 A. Yeah. A number of articles about Lisa,</p> <p>5 about the Middle East Forum, Tommy Robinson. Yeah,</p> <p>6 there were some. It didn't have legal</p> <p>7 repercussions, which I most feared.</p> <p>8 Q. Did it have any repercussions?</p> <p>9 A. Yeah, it did. I just told you.</p> <p>10 Q. What were the repercussions?</p> <p>11 A. It was mentioned time and again that the</p> <p>12 Forum was connected to the Tommy Robinson campaign.</p> <p>13 Q. Okay. I'd like you to please -- I'll make</p> <p>14 a request on the record to produce any articles that</p> <p>15 you say were repercussions of the article referenced</p> <p>16 in Document 60, okay?</p> <p>17 A. Okay.</p> <p>18 MR. CAVALIER: I'll just note for the</p> <p>19 record that, to the extent you have a request</p> <p>20 out there that those documents would be</p> <p>21 responsive to, we will do so.</p> <p>22 MR. CARSON: Well, I think we do, and</p> <p>23 they're in their second request for production</p> <p>24 of documents in response to your counterclaim.</p>	<p style="text-align: center;">---</p> <p>1 a colleague with whom you work, in your words,</p> <p>2 hand-in-hand." So you're acknowledging that she and</p> <p>3 Gregg have to work hand-in-hand, correct?</p> <p>4 A. Yes.</p> <p>5 Q. "He is not authorized to give you</p> <p>6 instructions, and he does not judge your work. In</p> <p>7 March, with your agreement, he took a more</p> <p>8 administrative -- he took -- he took on more</p> <p>9 administrative tasks, but this situation remains</p> <p>10 unchanged. Further, I plan the deputy director</p> <p>11 position that I sketched out for Marnie and you on</p> <p>12 Tuesday, that person will also report to me. In</p> <p>13 short, now and in the future, Gregg has no authority</p> <p>14 over you and cannot force you out of the Forum. I</p> <p>15 ask you to be wary of what Matt reported to you</p> <p>16 about Gregg's statements about you. I have reason</p> <p>17 to think that Matt wants to make trouble for us" [as</p> <p>18 read]. And that's -- you're basing that on Gregg</p> <p>19 telling you that Matt made that stuff up; is that</p> <p>20 right?</p> <p>21 A. In part, and in part on Matt's record of</p> <p>22 saying all sorts of things. I gave you one example</p> <p>23 of reporting to me that Marnie wants to become</p> <p>24 director, and he had a history with me of saying</p>	
	Page 374		Page 376
	<p style="text-align: center;">---</p> <p>1 BY MR. CARSON:</p> <p>2 Q. Sixty-two. So here in -- on June 17th,</p> <p>3 2017, you're talking about Lisa Barbounis' work on</p> <p>4 her own time, and you give her permission again.</p> <p>5 You say, "Go if you wish, but know that I will be</p> <p>6 very upset with -- upset with major consequences if</p> <p>7 your presence becomes known outside of Tommy</p> <p>8 Robinson's own circles" [as read], right?</p> <p>9 A. Yeah.</p> <p>10 Q. So you said you can keep doing it, just</p> <p>11 make sure there's no consequences for us, the Middle</p> <p>12 East Forum, right?</p> <p>13 A. Yeah.</p> <p>14 MR. CAVALIER: Object to form.</p> <p>15 THE WITNESS: One week before the EEOC</p> <p>16 complaints, I might note.</p> <p>17 BY MR. CARSON:</p> <p>18 Q. I know that's on your mind, Mr. Pipes, but</p> <p>19 that wasn't a question. All right. So we're gonna</p> <p>20 look at Document 65 now. Document 65 is an email</p> <p>21 from you to Ms. McNulty on May 10th. You tell her,</p> <p>22 "Thank you for your thoughts. Most importantly, I'd</p> <p>23 like to point out that, since November, you and</p> <p>24 everyone else in the office reports to me. Gregg is</p>	<p style="text-align: center;">---</p> <p>1 things that made me leery of what he was saying.</p> <p>2 Q. So I think -- I think that's everything on</p> <p>3 this one. There might -- let's see. Ms. Barbounis'</p> <p>4 employment from the Middle East Forum, she was</p> <p>5 permitted to submit expense reports, right?</p> <p>6 A. I don't know.</p> <p>7 Q. Why don't you know that?</p> <p>8 A. I didn't deal with expense reports.</p> <p>9 Q. Well, is it your understanding that</p> <p>10 employees were permitted to get reimbursed if they</p> <p>11 spent their own money on work-related expenses?</p> <p>12 A. If they were pre-authorized, yes. If they</p> <p>13 just decided -- [inaudible] --</p> <p>14 THE COURT REPORTER: I can't hear that,</p> <p>15 Mr. Pipes.</p> <p>16 THE WITNESS: If they pre-authorized, yes;</p> <p>17 if they on their own decided to submit</p> <p>18 expenses, no.</p> <p>19 BY MR. CARSON:</p> <p>20 Q. Well, if they submit expenses before they</p> <p>21 get paid, they have to be authorized, correct?</p> <p>22 A. They would only be reimbursed if they had</p> <p>23 been authorized. They got authorization.</p> <p>24 Q. And who makes that determination?</p>	

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	<p style="text-align: center;">---</p> <p>1 A. Gregg or me.</p> <p>2 Q. Well, in 2018 and 2019, Marnie Meyer made</p> <p>3 that determination, correct?</p> <p>4 A. No. We are speaking pre November. Post</p> <p>5 November, no, Marnie did not make that. I did.</p> <p>6 Q. It's your testimony that in order for an</p> <p>7 expense to be authorized, you had to authorize it?</p> <p>8 A. The personnel manual says the director or</p> <p>9 the president, and I took Gregg out of that, so it</p> <p>10 just left the president. Did not say the</p> <p>11 accountant.</p> <p>12 Q. So were you authorizing all the expenses</p> <p>13 submitted to the Middle East Forum for</p> <p>14 reimbursement?</p> <p>15 A. If there were, yes.</p> <p>16 Q. Okay. So how would that work? Marnie</p> <p>17 would tell you, hey, someone submitted an expense,</p> <p>18 can I pay it out, and then you'd say yes?</p> <p>19 A. Different ways.</p> <p>20 Q. Generally, though, would the -- is the</p> <p>21 procedure that an employee would submit their</p> <p>22 receipts to Marnie Meyer, Marnie Meyer would then</p> <p>23 confirm with you whether she was permitted to</p> <p>24 reimburse the money, and then, if you said yes, she</p>	<p style="text-align: center;">---</p> <p>1 I'm not saying she did. I'm saying I don't know.</p> <p>2 My job is to bring the money in. I did not oversee</p> <p>3 the spending of the money.</p> <p>4 Q. But you just testified it was your job to</p> <p>5 authorize whether an employee could be reimbursed</p> <p>6 for their expenses.</p> <p>7 A. Simple fact, but I did not get into the</p> <p>8 amounts, and I did not get into the payments and the</p> <p>9 like. I did not sign checks. I did not [inaudible]</p> <p>10 the checks. I did not look at the amounts that were</p> <p>11 being submitted. I simply said, yes, this is okay</p> <p>12 to reimburse.</p> <p>13 Q. And how would she do that, by email?</p> <p>14 A. I don't know. Various different ways.</p> <p>15 Q. Have you ever accused Marnie of paying an</p> <p>16 employee an expense that was unauthorized? Strike</p> <p>17 that. Have you ever accused Marnie of reimbursing</p> <p>18 an employee for -- for money spent that she wasn't</p> <p>19 supposed to?</p> <p>20 A. I don't recall that, no. Could've, but I</p> <p>21 don't recall it.</p> <p>22 Q. So this is Document 968, and this</p> <p>23 document, it says, to administrative staff, Marnie,</p> <p>24 from Daniel Pipes. It's not dated, but it says,</p>	
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	<p style="text-align: center;">---</p> <p>1 would reimburse it?</p> <p>2 A. I don't remember the usual way.</p> <p>3 Q. Well, what's the procedure for that?</p> <p>4 A. The key point is that I would give the</p> <p>5 authorization or not. I don't remember the --</p> <p>6 Q. But if Marnie Meyer reimbursed money, it</p> <p>7 means that you authorized it, correct?</p> <p>8 MR. CAVALIER: Object to form.</p> <p>9 THE WITNESS: She could've reimbursed</p> <p>10 money without checking with me.</p> <p>11 BY MR. CARSON:</p> <p>12 Q. Do you know whether she did that?</p> <p>13 A. I do not.</p> <p>14 Q. Have you ever thought that she might've</p> <p>15 done that?</p> <p>16 A. I don't deal with the books.</p> <p>17 Q. Well, do you have any reason to believe</p> <p>18 she did that?</p> <p>19 A. I don't know if she did or not.</p> <p>20 Q. So you don't have any reason to believe --</p> <p>21 it's not your question. Do you have any reason to</p> <p>22 believe that Marnie was authorizing expenses when</p> <p>23 she wasn't supposed to?</p> <p>24 A. I don't know. I'm not saying she didn't.</p>	<p style="text-align: center;">---</p> <p>1 "November 1st, 2018 was when I received a number of</p> <p>2 complaints about Gregg. I took the complaints at --</p> <p>3 I took the complainants -- I took the complainants</p> <p>4 at their word and immediately took steps to limit</p> <p>5 Gregg's role at MEF. In particular, I took away his</p> <p>6 office key" [as read]. When you said that, you mean</p> <p>7 that you think Marnie took his office key, correct?</p> <p>8 A. Yeah. Not me personally.</p> <p>9 Q. Okay. "On March 9th, 2019, responding to</p> <p>10 a demand from many of you, I reinstated him</p> <p>11 particularly" [sic] -- I'm sorry. I'm sorry.</p> <p>12 Strike that. "I reinstated him partially but</p> <p>13 maintained his limited access to the office. Now, I</p> <p>14 am happy to report we have completed a</p> <p>15 comprehensive" -- sorry. I lost my place. "Now, we</p> <p>16 have completed a comprehensive investigation into</p> <p>17 Gregg's conduct and have determined that all</p> <p>18 accusations against Gregg are a hundred percent</p> <p>19 false. Thus, there is now no reason to maintain the</p> <p>20 previous restrictions" [as read]. Do you see that?</p> <p>21 A. Yep.</p> <p>22 Q. Is that true?</p> <p>23 A. I don't know if I ever sent this. I don't</p> <p>24 know when I -- if I did --</p>	

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1	---	1	---
2	MR. CAVALIER: Yeah. Seth, I -- BY MR. CARSON: 3 Q. I mean, is this accurate? 4 A. It could be a draft. It could be -- 5 MR. CAVALIER: Yeah. This may be a draft 6 that has privilege issues attached to it. 7 MR. CARSON: You guys produced it, 8 Document 968. 9 MR. CAVALIER: Mark confidential -- yeah, 10 you're gonna have to let him read it. 11 MR. CARSON: They're all marked 12 confidential, every document you gave me. 13 MR. CAVALIER: My only point is you're 14 gonna have to let us read it here if you want 15 us to answer questions about it because I'm not 16 sure what it is. 17 MR. CARSON: I just read it to you. 18 MR. CAVALIER: You read us the top part. 19 I wanna see the whole document. 20 MR. CARSON: Well, this is the whole 21 document. 22 MR. CAVALIER: I can only see down to 23 "Original". There's obviously more text. 24 MR. CARSON: Well, I'll get to that in	1	BY MR. CARSON: 2 Q. Well, when -- 3 A. As of today, I can tell you, yes, I 4 have -- we have completed -- I can endorse that as 5 of today. I cannot do it as some arbitrary date in 6 the past, but today, yes. 7 Q. Well, when? When did that happen? When 8 did that investigation happen? 9 A. I can tell you today that I endorsed it. 10 I cannot give you a date. 11 Q. I'm asking you when the -- you said that 12 your conclusion that everything [unintelligible] is 13 based on a comprehensive investigation. 14 MR. CAVALIER: So unless and until you let 15 us -- 16 --- 17 (Indistinguishable cross-talk.) 18 --- 19 MR. CAVALIER: -- but if you're gonna 20 refer to the document and base your questions 21 on it, you need to let us see the document. 22 MR. CARSON: I'll get to -- I'll 23 [unintelligible]. 24 BY MR. CARSON:
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1	---	1	---
2	just a second. 3 MR. CAVALIER: It's the same document. 4 BY MR. CARSON: 5 Q. I'm asking you about this sentence. Is 6 this true? Did you perform an investigation -- 7 --- 8 (Indistinguishable cross-talk.) 9 --- 10 MR. CAVALIER: Seth, he's not gonna answer 11 questions on a -- 12 MR. CARSON: I'm not asking about the 13 document then [unintelligible]. 14 BY MR. CARSON: 15 Q. Did you complete a comprehensive 16 investigation to Gregg's conduct and determine that 17 all accusations against Gregg are a hundred percent 18 false? Did you do that? 19 A. I -- 20 MR. CAVALIER: You're asking at any time, 21 at any point in the universe? 22 MR. CARSON: Sure. 23 THE WITNESS: At some point, yes. When 24 this was written, I don't know. I don't know if it was sent --	1 Q. When did you complete -- when did you do 2 this investigation? 3 A. Over the past two years. 4 Q. Over the past two years you did an 5 investigation? 6 A. Since November 1st, so -- 7 Q. So you've been investigating this matter 8 since November 1st, 2018? 9 A. Yeah, thanks to you. 10 Q. Okay. What did you do to investigate the 11 reports of discrimination and harassment in the 12 workplace after January 1st, 2019? 13 MR. CAVALIER: Object to form. 14 BY MR. CARSON: 15 Q. What did you do to investigate it? What 16 are the steps you took? 17 MR. CAVALIER: This is asked and answered. 18 MR. CARSON: No, it's not. Yeah, you're 19 right. It is, and he said he did nothing. 20 MR. CAVALIER: I disagree with your -- 21 --- 22 (Indistinguishable cross-talk.) 23 --- 24 THE WITNESS: I received no complaints. I	

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1	-----	1	-----
2	received moans about how Gregg is a lousy	2	Q. Mr. Pipes, did you take any witness
3	person, but I received nothing that I was to	3	statements?
4	investigate. I mean, when Tricia says, he	4	MR. RIESER: Is it your position you have
5	doesn't want me here, what am I supposed to	5	the right to interject and interfere with the
6	investigate?	6	client -- with the deponent's --
7	BY MR. CARSON:	7	MR. CARSON: Mr. Rieser, we're gonna go
8	Q. So you have not investigated this matter	8	off the record if you're gonna say anything
9	since November 2018, correct?	9	else today.
10	A. No, not correct. Investigating it	10	MR. RIESER: I don't agree to go off the
11	unendingly until November 17th, 2020. Thank you.	11	record.
12	Q. Okay. So what -- what did you do? Who	12	MR. CARSON: Well, you don't get to agree
13	did you -- I'll get more specific. Did you take any	13	or not agree. You're not -- you're here to
14	witness statements?	14	watch. That's it.
15	A. We have been taking witness statements.	15	MR. RIESER: I am representing a defendant
16	We've been reading emails and texts and so forth	16	in the case.
17	unendingly --	17	MR. CARSON: Right, exactly, a defendant
18	Q. Who did you get witness statements from?	18	who's not testifying today, but we're not --
19	A. Would you let me finish?	19	look. The question is standing.
20	Q. No. Let's just -- let's just take it step	20	BY MR. CARSON:
21	by step. Who did you --	21	Q. Mr. Pipes, did you take any witness
22	MR. RIESER: Seth, you can't interrupt	22	statements? It's just a yes or no question.
23	him. You really can't.	23	A. Yes.
24	MR. CARSON: No, I can, and, Mr. Rieser,	24	Q. Who? Who'd you take them from?
	you have no standing to put anything on the		A. I don't remember. There's so many people
	Page 386		Page 388
1	-----	1	-----
2	record today.	2	we've talked to.
3	-----	3	Q. Well, name one person that you took it
4	(Indistinguishable cross-talk.)	4	from.
5	-----	5	A. I am not --
6	MR. CAVALIER: What're you talking about?	6	Q. Tell me one.
7	He's representing Gregg Roman, a defendant in	7	A. -- go down this path with you, Mr. Carson.
8	the case.	8	We have done enormous amount of research.
9	MR. CARSON: Gregg Roman's not on --	9	Q. Did you hire an investigator?
10	[unintelligible] not testifying.	10	A. We did all sorts of things.
11	MR. RIESER: It's -- I --	11	Q. Yes or no, did you hire an investigator?
12	MR. CAVALIER: So what? He's allowed to	12	A. We did not hire an investigator.
13	represent his client.	13	Q. You're saying you did all sorts of things,
14	BY MR. CARSON:	14	but you can't give me one example of something you
15	Q. Anyway, it was a yes or no question. Did	15	did, so that's why I'm just trying to drill down on
16	you take any witness statements?	16	you what your testimony is.
17	MR. RIESER: Seth, you're out of control.	17	A. You've got --
18	Your behavior's outrageous.	18	Q. So if you've taken a witness statement,
19	MR. CARSON: Right.	19	tell me a name of somebody. If you've hired
20	-----	20	investigator, you know, if you've looked at
21	(Indistinguishable cross-talk.)	21	records -- like tell me what you've done to
22	-----	22	investigate it.
23	MR. CARSON: Your objection is totally	23	A. I was trying to [inaudible] and you
24	inappropriate.	24	interrupted me.
	BY MR. CARSON:		Q. Well, let's go step by step. So, witness

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1	statements, can you name anyone you've taken a 2 witness statement from? 3 A. We have taken witness statements, yes. 4 Q. From who? 5 A. I don't wanna tell you. 6 Q. You have to tell me. 7 A. I don't know why I have to tell you. 8 Q. Because it's your deposition. You have to 9 tell me. 10 A. Well, okay. Danny Thomas. 11 Q. You took a witness statement from Danny 12 Thomas? 13 A. Yeah. 14 Q. Anybody else? 15 A. Not that I remember. 16 Q. Okay. So did you review any records that 17 made you determine that everything is a hundred 18 percent false regarding Gregg Roman? 19 A. Yes. 20 Q. What records did you review? 21 A. Electronic records of all sorts, emails, 22 texts. 23 Q. Well, can you think of any specific email 24 that you read that indicates that everything that	Page 390	<p style="text-align: center;">---</p> <p>1 MR. CAVALIER: You asked him a question. 2 This time, he's gonna finish his answer. 3 MR. CARSON: No. 4 BY MR. CARSON: 5 Q. Who said that she wasn't troubled? 6 MR. CAVALIER: Daniel -- 7 8 (Indistinguishable cross-talk.) 9 10 MR. CAVALIER: He is directly responding 11 to your question. 12 13 (Indistinguishable cross-talk.) 14 15 THE WITNESS: We have -- 16 BY MR. CARSON: 17 Q. Mr. Pipes, who said she wasn't troubled? 18 I'm asking about what you just said. 19 A. You're not interrupting me. 20 MR. CAVALIER: You can ask him when he's 21 finished his answer. 22 MR. CARSON: He is finished his answer. 23 MR. CAVALIER: No, he's not. Clearly, 24 he's not.</p>
1	Gregg Roman that was -- 2 3 (Indistinguishable cross-talk.) 4 5 BY MR. CARSON: 6 Q. Let me finish my question. Can you think 7 of any document that you read or reviewed at any 8 time that indicates that everything, all allegations 9 against Gregg Roman, are a hundred percent false? 10 A. It is the sum of evidence. We can look at 11 three incidents in particular. Since we're 12 discussing Ms. Barbounis, we can go over the Israel 13 one. 14 Q. We can go over what? 15 A. We can go over the Israel one since 16 Ms. Barbounis is the topic today. She -- we have 17 texts from her saying there was no -- nothing 18 happened in Israel. Right contemporaneous, we have 19 statements by people who met her at that time who 20 said she was not troubled. 21 Q. Who? Who said that? Who said she wasn't 22 troubled? 23 A. We have -- don't interrupt. 24 Q. Mr. Pipes --	Page 392	<p style="text-align: center;">---</p> <p>1 BY MR. CARSON: 2 Q. Who testified that -- who told you that 3 she was -- 4 5 (Indistinguishable cross-talk.) 6 7 MR. CAVALIER: Either withdraw your 8 question -- 9 THE WITNESS: I'm not dealing with this. 10 MR. CAVALIER: -- or let him answer it. 11 MR. CARSON: We have to go off the record. 12 The witness is making a phone call. 13 MR. CAVALIER: I don't agree to go off -- 14 15 (Indistinguishable cross-talk.) 16 17 THE WITNESS: -- because you're not 18 letting me say what I wanna say. 19 BY MR. CARSON: 20 Q. Who you gonna call? 21 A. I'm not calling anyone. I was gonna read 22 the news, and I'm not gonna do -- 23 24 (Indistinguishable cross-talk.)</p>

	Page 393	Page 395
1	---	1
2	---	2
3	MR. CAVALIER: Seth, you asked him the	BY MR. CARSON:
4	question, what did he look at to determine that	Q. Who told you that Ms. Barbounis wasn't
5	the allegations were false. He was in the	troubled?
6	middle of an answer, and you cut him off.	MR. CAVALIER: Seth, I mean, I can't be
7	MR. CARSON: He said that he talked to	any more clear with you.
8	witnesses who said that Lisa wasn't troubled,	MR. CARSON: Yeah. I'm not gonna be any
9	and my simple question is, who were they?	more clear, either. I mean, we're just gonna
10	MR. CAVALIER: No. You asked him what he	end up doing this all again tomorrow, I think,
11	did. He was telling you what he did, and then	right, or another day, and it's crazy because
12	you decided to interject and interrupt with a	it could easily get done today.
13	new question. You've gotta let him finish his	MR. CAVALIER: Seth, just because --
14	answer.	---
15	MR. CARSON: -- because I wanna know who	(Indistinguishable cross-talk.)
16	he spoke to, who these witnesses --	---
17	MR. CAVALIER: Well, you can ask him who	MR. CAVALIER: Just because you don't like
18	he spoke to after he's done his answer, but	the answer to a question doesn't --
19	you're not gonna cut him off in the middle and	MR. CARSON: I have no problem with the
20	make his answer look incomplete when he's	answer, but we're not -- he's just sitting
21	answered --	there generally -- I looked at a lot of
22	---	documents. I talked to witnesses who said
23	(Indistinguishable cross-talk.)	this. If he's gonna say that he spoke to
24	---	witnesses, just name them.
	MR. CARSON: I am, actually, because --	MR. CAVALIER: The question is, what did
	Page 394	Page 396
1	---	---
2	---	1
3	(Indistinguishable cross-talk.)	you do --
4	---	2
5	MR. CARSON: Okay. All right. So, what,	MR. CARSON: That wasn't actually the
6	you guys are walking out?	question.
7	MR. CAVALIER: No. We're sitting here,	MR. CAVALIER: -- to determine the
8	and we're telling you we're ready to finish our	allegations were false?
9	answer whenever you're ready to allow us to do	MR. CARSON: No, that wasn't the question.
10	so.	That's not the pending question. The question
11	MR. CARSON: I'll withdraw the question.	was, did you look at any documents?
12	BY MR. CARSON:	MR. CAVALIER: That was not the question.
13	Q. Mr. Pipes, who did you -- who told you	MR. CARSON: That was the last question I
14	that Ms. Barbounis was not troubled?	asked. Do you wanna check? What happens when
15	MR. CAVALIER: That's not gonna work this	I'm right? Are you gonna let me continue my
16	time.	deposition?
17	MR. CARSON: There's no question pending	MR. CAVALIER: You can do whatever you
18	now. Who told you that Ms. Barbounis --	want, but he's entitled to finish his answer,
19	MR. CAVALIER: -- was an answer pending	Seth. I don't know how many different ways I
20	that he was halfway through.	can say it.
21	MR. CARSON: I withdrew the question.	MR. CARSON: Well, answering the question
22	It's not a question anymore.	that I ask. You're right.
23	MR. CAVALIER: It doesn't matter.	BY MR. CARSON:
24	---	Q. So what documents did you look at?
	(Indistinguishable cross-talk.)	MR. CAVALIER: You can finish your answer,
		Daniel, until Seth cuts you off again and --

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1	-- (Indistinguishable cross-talk.)	1 you've seen these statements, correct? 2 MR. CAVALIER: To the extent that you have 3 document requests out that are responsive, 4 which, by the way -- 5 -- 6 (Indistinguishable cross-talk.)
7	MR. CARSON: I mean, you guys are just 8 making it so we're gonna have to come back and 9 do this all over again, and it sucks, but, you 10 know, whatever. 11 THE WITNESS: We did research, not all by 12 me personally, into electronic communications, 13 talking to people who met her. 14 BY MR. CARSON: 15 Q. Who? 16 A. And also we reviewed the social media. 17 Q. Okay. What accounts? 18 A. And we looked -- we talked to people who 19 knew her -- 20 Q. You said that already. 21 A. No. So we did a lot of research into what 22 happened in -- and her response in -- 23 Q. I didn't ask you what her response was. I 24 said, what documents did you look at? A. Emails, texts, social media. Profusely. Q. Okay. Who did you talk to that said that	8 MR. CARSON: I'm requesting specific 9 documents that I didn't know existed that are 10 absolutely responsive to our request that 11 weren't produced. 12 -- 13 (Indistinguishable cross-talk.) 14 -- 15 THE COURT REPORTER: Stop! Seriously -- 16 MR. CAVALIER: Responses to your requests 17 are not due yet. 18 MR. CARSON: Yeah. My first ones are due 19 six months ago. Mr. Pipes -- 20 MR. CAVALIER: -- responsive to your first 21 ones. 22 BY MR. CARSON: 23 Q. Mr. Pipes, are you a hundred percent sure 24 that you've read statements from people that saw

  

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1	she was not affected by anything? A. People that she met the next day in 2 Israel. Q. Who? Who are they? A. I can't provide you with the names. Q. Why? A. I don't know them. I don't remember. Q. You don't know -- you don't know their names, right? A. I've seen the names. I -- I am not -- Q. Are you producing them as witnesses in this case? MR. CAVALIER: Objection. BY MR. CARSON: Q. Have you taken a declaration or a statement for any of these people? A. Yes, we've taken statements. Q. You have? MR. CARSON: All right. So, Jon, please, can you turn over these statements that he's testifying about? MR. CAVALIER: As I've told you before -- BY MR. CARSON: Q. You're testifying today under oath that	1 Ms. Barbounis the next day that -- where she said 2 she was just fine? A. First of all, these are brand new, so you 4 couldn't have had them six months ago. Q. My question was, are you a hundred percent 6 sure that you've read statements from people who saw 7 Ms. Barbounis the next day who said that she was 8 just fine? Are you sure that you've read those 9 statements? It's a yes or no question. A. Secondly, I'm not sure -- Q. Mr. Pipes -- Mr. Pipes, I asked you a simple yes or no question. Are you sure that you've read these statements that you're testifying about? A. Secondly, I'm not sure if I read them or they were read to me. Q. Okay. If they were read to you, do you know who read them to you? A. Thirdly, I'm not sure whether they met her exactly the next day or the day after that, so I'm vague on this. This is not something I know in detail. Q. Are you sure that you've heard or read these statements? A. I'm sure that there are statements about

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1	the state of how Lisa appeared and acted in the 2 aftermath of that evening. 3 Q. And they're from people who were in 4 Israel? 5 A. People who were in Israel. 6 Q. Okay. 7 MR. CARSON: Okay. Like I said, Jon, you 8 guys gotta turn them over if you have them. 9 MR. CAVALIER: You're not getting a 10 dispute from me. I agree with you. They will 11 be turned over in due course in accordance 12 with -- 13 MR. CARSON: I mean, due course would've 14 been like seven months ago, I think. 15 - - - 16 (Indistinguishable cross-talk.) 17 - - - 18 MR. CAVALIER: -- seven months ago that 19 didn't exist two weeks ago, but we'll leave 20 that to the discovery practice and the federal 21 rules, as I said. 22 BY MR. CARSON: 23 Q. 968, memo from Mr. Pipes. So, next, we're 24 gonna look at -- we'll get back to this memo. So	1	1 BY MR. CARSON: 2 Q. So here you said that he's -- 3 MR. CAVALIER: No. I told you we're not 4 answering questions about -- 5 MR. CARSON: Well, I'm gonna put the 6 question on the record, and you can object to 7 it, but we're gonna get an answer to it one 8 day. 9 MR. CAVALIER: Well, for someone who's 10 complaining about lack of time -- 11 BY MR. CARSON: 12 Q. "Now, the year is up, and I am pleased to 13 inform you that he has learned his lesson. I found 14 no -- I have found no fault in his work, and no one 15 on the staff has complained about his actions. 16 Therefore, I am asking him to begin" [as read] -- so 17 you see the problem here, right, Mr. Pipes? 18 MR. CAVALIER: Daniel, do not -- 19 - - - 20 (Indistinguishable cross-talk.) 21 - - - 22 MR. CAVALIER: -- not to answer any 23 questions about this document -- 24 - - -
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1	here's the memo that you wrote where you said you 2 did a investigation and you found a hundred percent 3 sure, and then here's another one where it says the 4 exact same thing, right, only here it says -- 5 MR. CAVALIER: We're now back on a 6 document that you will not let us read in full. 7 MR. CARSON: This is the whole document. 8 MR. CAVALIER: So let us read it. 9 MR. CARSON: You can read it. 10 MR. CAVALIER: Yeah. So I don't -- now 11 that I recognize this, I don't know why it was 12 produced. If it was, it was inadvertent, and 13 we're objecting to it on the grounds of 14 attorney-client privilege. 15 MR. CARSON: It's not attorney-client 16 privilege. It's a document that's addressed to 17 Marnie Meyer. 18 MR. CAVALIER: It was never sent. I don't 19 know why this was produced. I didn't produce 20 it, but we're not answering questions about it, 21 and we're gonna demand that it be returned to 22 us. 23 MR. CARSON: Yeah. You're gonna get an 24 argument on that one.	1	1 (Indistinguishable cross-talk.) 2 - - - 3 MR. CARSON: Objection, privilege is the 4 way it works. 5 BY MR. CARSON: 6 Q. You went from finding that he learned his 7 lesson to doing a hun -- a comprehensive 8 investigation and determining a hundred percent the 9 allegations are false. Why -- do you see the 10 inherent contradiction in those two statements? 11 MR. CAVALIER: Objection. Attorney-client 12 privilege. Daniel, I am instructing you not to 13 answer any questions about this document. 14 BY MR. CARSON: 15 Q. Well, we're gonna get to the bottom of it, 16 Mr. Pipes, because it's a pretty -- pretty big 17 difference between your two statements there. 18 - - - 19 (Indistinguishable cross-talk.) 20 - - - 21 MR. CAVALIER: Object to the editorial. 22 Object to the argumentative nature of your 23 statement. Object to the mischaracterization. 24 MR. CARSON: Are you objecting to a

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1	<p style="text-align: center;">---</p> <p>question right now, or you just objecting --</p> <p>2 MR. CAVALIER: I'm objecting to the fact</p> <p>3 that you're editorializing and not asking a</p> <p>4 question.</p> <p>5 THE WITNESS: I have no problem answering</p> <p>6 to the alleged discrepancy. Jon --</p> <p>7 BY MR. CARSON:</p> <p>8 Q. So June 10th, 2019 --</p> <p>9 THE WITNESS: Jon, I have no problem</p> <p>10 answering to the alleged discrepancy.</p> <p>11 MR. CAVALIER: Daniel, you're not</p> <p>12 answering any questions about a privileged</p> <p>13 document. I know that you can answer the</p> <p>14 questions, and I know the answers are simple,</p> <p>15 but for the sake of the argument and the</p> <p>16 preservation of the privilege, I cannot allow</p> <p>17 you to answer any questions about it.</p> <p>18 MR. CARSON: He can waive his privilege.</p> <p>19 It's his privilege. He can waive --</p> <p>20 MR. CAVALIER: I'm instructing him not to</p> <p>21 answer the questions about the document.</p> <p>22 BY MR. CARSON:</p> <p>23 Q. Are you taking your attorney's advice, Mr.</p> <p>24 Pipes?</p>	<p style="text-align: center;">---</p> <p>1 They told you that Gregg was speculating that the</p> <p>2 new allegation for Marnie had to do with Gabrielle</p> <p>3 Bloom, and it had to do with Marnie and Caitriona's</p> <p>4 father, right?</p> <p>5 A. It had to do with the rumor, but I don't</p> <p>6 know what the reference is to what he might've</p> <p>7 thought. I don't remember that.</p> <p>8 Q. But you told Marnie that he's speculating</p> <p>9 that it's about a completely unrelated matter.</p> <p>10 A. Yeah, I told him that, but I --</p> <p>11 Q. Yeah.</p> <p>12 A. Nowhere does it mention Gabrielle Bloom.</p> <p>13 Q. But that's what you are referencing,</p> <p>14 right? That's the unrelated matter that he's</p> <p>15 speculating about.</p> <p>16 A. I -- I don't agree to that.</p> <p>17 Q. You're getting the information from</p> <p>18 Ms. McNulty, correct?</p> <p>19 A. I don't -- no, not correct. I --</p> <p>20 Q. Ms. McNulty sent you an email the same day</p> <p>21 where she told you about Gregg Roman and Matt's</p> <p>22 conversation. So here you're giving Marnie</p> <p>23 information about the conversation, but then you're</p> <p>24 denying that it happened on the other side, right?</p>	<p style="text-align: center;">---</p>
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1	<p style="text-align: center;">---</p> <p>A. I am.</p> <p>Q. Sorry, what?</p> <p>A. I am, yes. There we go. Rumor was</p> <p>4 started prior to November 1st.</p> <p>5 Q. Right. Because of that, you didn't do</p> <p>6 anything about it, right? He got a reprieve for</p> <p>7 everything that happened pre November 1st. So do</p> <p>8 you see this right here?</p> <p>A. Yup.</p> <p>Q. "Marnie, I have just been given news of</p> <p>11 what appears to be an instance of Gregg's</p> <p>12 misbehavior that has nothing to do with you. I'd</p> <p>13 like to confront him with what -- with that and also</p> <p>14 with what you told me last week. So far, I just</p> <p>15 told him that you disclosed troubling information to</p> <p>16 me, but he has no idea what that might be. Indeed,</p> <p>17 he is speculating that it concerns something</p> <p>18 entirely unrelated to what you told me" [as read].</p> <p>19 Right? You were talking about how he thought it was</p> <p>20 Gabrielle Bloom, right?</p> <p>MR. CAVALIER: Object to form.</p> <p>THE WITNESS: Huh? No.</p> <p>BY MR. CARSON:</p> <p>Q. That's what you're referring to there.</p>	<p style="text-align: center;">---</p> <p>1 A. I have no reason to think this has</p> <p>2 anything to do with Gabrielle Bloom.</p> <p>3 Q. So what did you mean, then? What was the</p> <p>4 unrelated matter that he was speculating and</p> <p>5 concerns [sic]?</p> <p>6 A. I don't remember what his speculation was.</p> <p>7 It was wrong, whatever it was.</p> <p>8 Q. We can't hear you.</p> <p>9 A. It was wrong, whatever it was.</p> <p>10 Q. It wasn't Gabrielle Bloom. It was</p> <p>11 Caitriona Brady, Caitriona Brady's father, and</p> <p>12 Marnie Meyer, right?</p> <p>13 A. I believe that the topic of this is the</p> <p>14 rumor, yes.</p> <p>15 Q. Is this when Matt Bennett -- Matt</p> <p>16 Bennett's employment ended? Marnie Meyer,</p> <p>17 3/11/2019?</p> <p>18 A. No. He ended on the 8th.</p> <p>19 Q. So she's telling him, "You're welcome for</p> <p>20 the laptop," right? She's telling him he can keep</p> <p>21 the laptop, right?</p> <p>22 A. Yeah.</p> <p>23 Q. And the laptop you're referring to was the</p> <p>24 Apple laptops that everyone was -- that MEF bought</p>	<p style="text-align: center;">---</p>

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1	the employees, correct?	1	two years, 500; and if you're there for three years,
2	A. No.	2	it's yours.
3	Q. That's not the laptop?	3	Q. But he didn't have to pay anything, right?
4	A. No.	4	He got to keep it?
5	Q. What's the laptop that he's allowed to	5	A. No. He had to pay.
6	keep?	6	Q. Well, where'd that money come from? Did
7	A. The laptop he purchased.	7	he give you a check?
8	Q. He purchased it with MEF money, right?	8	MR. CAVALIER: Object to form.
9	A. Yes.	9	BY MR. CARSON:
10	Q. Right, and it was the Apple laptop, right?	10	Q. How'd he pay for it?
11	A. I don't know what make it was. He had --	11	A. Don't know how he paid for it. I have --
12	Q. Can't hear you.	12	---
13	A. I don't know what make it was. He had a	13	(Indistinguishable cross-talk.)
14	choice to buy whatever laptop [inaudible] --	14	---
15	Q. Did Matt help facilitate everyone using	15	THE WITNESS: We have an accountant for
16	Macs in 2019?	16	that. I didn't deal with --
17	A. I don't know if everybody used Apples.	17	BY MR. CARSON:
18	Some did. I don't know if --	18	Q. Well, Marnie Meyer was the accountant,
19	Q. And Matt was permitted to keep his laptop,	19	correct? Right? Marnie Meyer?
20	right?	20	A. Yes.
21	A. He was permitted to keep it on condition	21	Q. So if she says that he got it for free, do
22	that he paid the remainder of what he had -- what he	22	you have a reason to disagree with that?
23	had -- the time he wasn't there.	23	A. Of course. It's not -- that's not what
24	Q. He paid for it? Are you sure about that?	24	she's saying.
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1	---	1	---
2	A. Yes. That's what she's...	2	Q. It actually is what she's saying,
3	Q. She's saying, "You're welcome for the	3	Mr. Pipes, but, Mr. Pipes, do you have any -- what
4	laptop". Why is she saying "you're welcome" if he	4	reason do you have to believe that he paid for it?
5	paid for it?	5	A. -- "happy to work that out for you."
6	A. Because he got some credit for the time he	6	Namely, working out what he owed and how that would
7	was there when he used the laptop. The deal --	7	be paid to the Forum.
8	Q. They all got credit. It's called	8	Q. "You're welcome for the laptop. I was
9	depreciation, right?	9	happy to work that out for you. The deal also
10	MR. RIESER: Seth, please don't interrupt	10	included setting up the docking stations for
11	him.	11	everyone. Although, those did not arrive in time
12	THE WITNESS: If you're there, I think,	12	for you to do that." What she's saying is she
13	for three years, the laptop is yours, and if	13	worked it out so he didn't have to pay for it. He
14	you leave earlier, then you have to pay -- we	14	just got to keep it. That's what she's telling him,
15	paid --	15	correct?
16	BY MR. CARSON:	16	A. No.
17	Q. Correct.	17	Q. Why don't -- what evidence do you have to
18	A. -- \$1500 -- don't interrupt.	18	suggest that he actually gave money for the laptop?
19	Q. That's according to the	19	A. Actually, what I think happened is he did
20	bring-your-own-device agreement, right?	20	extra work after he left that paid for some of the
21	A. We paid \$1500, if I remember correctly,	21	laptop.
22	and --	22	Q. So he didn't pay for it.
23	Q. Right, but he didn't pay anything --	23	A. No. He did --
24	A. Let me finish. If you're there for one	24	Q. Right? He got to keep it?
	year, you would pay a thousand; if you're there for		A. No. He paid for it. Whether he paid for

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1	it in cash or paid for it in extra work, I'm not 2 exactly sure of, but he did not -- he was not handed 3 a laptop on leaving. No, no. He had to pay. 4 Q. Did Marnie Meyer come to you and get 5 permission from you to allow Matt to keep the 6 laptop? 7 A. I don't remember. You have to -- 8 Q. Are there -- yes or no, did she, or "I 9 don't know"? 10 A. I don't know. 11 Q. Okay. Is there gonna be communications 12 between you and Marnie Meyer where you discuss it? 13 MR. CAVALIER: Object to form. 14 BY MR. CARSON: 15 Q. Yes, no, "I don't know"? 16 A. What's the question? 17 Q. Did you and Marnie Meyer discuss it 18 through WhatsApp or Telegram or texting? 19 A. I don't remember. 20 Q. You don't remember if you discussed 21 whether he was allowed to keep the laptop? 22 A. I remember having discussion with her. 23 Whether it was this medium or that medium, I have no 24 idea. [Inaudible] person. I have no idea.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Q. Did you receive this email? A. No. Q. Okay. MR. RIESER: Luke, can you let us know how much time's left? THE VIDEOGRAPHER: We will reach the seventh hour at 6:53. MR. RIESER: Thank you very much. THE VIDEOGRAPHER: -- now 6:40, so we have -- MR. CARSON: Yeah. We're gonna go past 7:00, maybe. MR. RIESER: No, we're not. No, we're not. MR. CARSON: Bill, you can say whatever you want. You don't have a client here today. MR. CAVALIER: Well, then, I'll say it for him. We're not going past 7:00. MR. CARSON: I'm letting you know, if we don't, we're gonna file a motion to do another deposition. MR. CAVALIER: You are welcome to file that motion. MR. CARSON: Yeah. Well, we can because
1	Q. So she did come to you and say, hey, can 2 he keep the laptop, and you approved it, right? 3 A. I -- I remember something about Matt and 4 his laptop and his doing [inaudible] -- 5 THE COURT REPORTER: Hold on. There's 6 like a bunch of shuffling going on. 7 BY MR. CARSON: 8 Q. Go ahead, Mr. Pipes. What's your answer? 9 A. I remember there was some discussion of 10 Matt's laptop, and we made some kind of arrangement 11 to decrease what he owed the Forum [inaudible] -- 12 Q. Can't hear you because of the shuffling. 13 A. -- and that, I think, is the reference to 14 the docks that hadn't arrived yet, that he was gonna 15 be working on that. But, no, he was not gifted a 16 1500-dollar contribution towards a laptop. In so 17 far as he didn't pay that back, he earned it some 18 other way by doing extra work after he left the 19 Forum because he was the tech guy, and he knew what 20 was going on in a way that no one else did, and we 21 needed him for that help. 22 Q. Here's an email dated April 23rd, 2019, 23 right? 24 A. Yeah.	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	Page 414 --- there's a counterclaim, so we actually get another seven hours on the counterclaim, but we also get it because of the total misconduct that we had today. MR. RIESER: The only misconduct is from you, Seth. MR. CARSON: Bill, I don't know what you think you're doing talking on the record. You're here to observe, and that's it. MR. CAVALIER: You realize he's allowed to ask questions of this witness if he wants -- MR. CARSON: No. He can ask questions. He can't object on his behalf. He doesn't represent him. MR. RIESER: I'm within my rights, Seth. MR. CARSON: No, you're not. You don't represent the witness. You can't enter objections on behalf of someone you don't represent. MR. RIESER: I'm -- MR. CARSON: I don't know why you would think you can. MR. RIESER: Okay. You wanna keep barking at me, that's fine.

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<p style="text-align: center;">---</p> <p>1 BY MR. CARSON:</p> <p>2 Q. Okay. So, here, Marnie Meyer is sending</p> <p>3 an email to you, right, Mr. Pipes?</p> <p>4 A. Yep.</p> <p>5 Q. "Thanks for allowing me to weigh in on</p> <p>6 this. The final note I have is regarding the</p> <p>7 foundations. Matt mentioned a website we used to</p> <p>8 belong to that would allow us to do research -- to</p> <p>9 research other foundations. I was interested in</p> <p>10 playing with that idea and seeing if we could stir</p> <p>11 up additional funds. I was figuring I would work</p> <p>12 with Marc. I know he's got a lot on his plate and</p> <p>13 deadlines sometimes always get -- get away from him.</p> <p>14 I would look to organize things a bit and then try</p> <p>15 to reuse what he's already created to apply other</p> <p>16 foundations. Just a thought, but something should</p> <p>17 definitely -- but someone should definitely help him</p> <p>18 with the timeliness, et cetera" [as read]. Do you</p> <p>19 remember receiving this email?</p> <p>20 A. No.</p> <p>21 Q. You don't?</p> <p>22 A. Why would I remember some random email</p> <p>23 from two years ago?</p> <p>24 Q. I don't know. Do you remember it, yes or</p>	<p style="text-align: center;">---</p> <p>1 Q. I know that's what you think.</p> <p>2 A. Which she did not do. I am not gonna</p> <p>3 spend my entire time tracing down every random</p> <p>4 rumor.</p> <p>5 Q. Yeah. "She was disappointed that she</p> <p>6 never got the chance to show her stuff. She's</p> <p>7 disappointed that she did not receive a salary</p> <p>8 increase," and then I think you say, "She will get</p> <p>9 one now," correct?</p> <p>10 A. Correct.</p> <p>11 Q. So you are copying something that Marnie's</p> <p>12 telling you, and then you are responding to it,</p> <p>13 correct?</p> <p>14 A. Yep. She got a raise.</p> <p>15 Q. Okay. "You mentioned finding her</p> <p>16 'standoffish,' and I think that she can" -- this is</p> <p>17 Marnie to you -- "and I think that she can be as</p> <p>18 well, but she's an introverted person so much so</p> <p>19 that she brought that up at her interview. She</p> <p>20 actually has a great personality, but if you are not</p> <p>21 around her much, you may not get a chance to see</p> <p>22 that. My point is that I feel that in time you'll</p> <p>23 get to know her better and see her as less</p> <p>24 standoffish and that I think she's earned a shot"</p>		
<p style="text-align: center;">---</p> <p>1 no?</p> <p>2 A. No.</p> <p>3 Q. How about -- do you remember responding?</p> <p>4 A. No.</p> <p>5 Q. Meetings with Matt?</p> <p>6 A. No.</p> <p>7 Q. "Tricia: I know that she wants the chance</p> <p>8 to move up. I also know that, in preparation for</p> <p>9 her yearly review, she had prepared a spreadsheet to</p> <p>10 show how she had advanced and the events gig far and</p> <p>11 beyond what Eman had ever done with it" [as read].</p> <p>12 Did you ever interview Eman about Gregg Roman?</p> <p>13 A. No.</p> <p>14 Q. Why not?</p> <p>15 A. Why should I?</p> <p>16 Q. Well, people brought it to your attention</p> <p>17 that Eman had complained about him, right?</p> <p>18 A. I never heard any.</p> <p>19 Q. You never saw any emails where people</p> <p>20 brought it to your attention that Eman complained</p> <p>21 about him?</p> <p>22 A. No. Anyway, the key point is not whether</p> <p>23 I solved rumors; it's whether Eman herself comes to</p> <p>24 me and tells me she's got a problem.</p>	Page 418	<p style="text-align: center;">---</p> <p>1 [as read]. You responded, "She has to show some</p> <p>2 personality around me to see her beyond the confines</p> <p>3 of her events at work. For example, since the Matt</p> <p>4 resignation, I have heard from Lisa and yourself</p> <p>5 about the current situation, but not from Tricia"</p> <p>6 [as read]. In fact, Tricia sent you several emails,</p> <p>7 right, about it?</p> <p>8 A. At this time I don't know.</p> <p>9 Q. Well, we've looked at a bunch of them</p> <p>10 today, correct?</p> <p>11 A. They were in April and June, if I</p> <p>12 remember.</p> <p>13 Q. April, May, and June. Every month.</p> <p>14 A. This is February. I don't remember</p> <p>15 anything from February.</p> <p>16 Q. Okay. So she never sent you anything</p> <p>17 before April, May, June?</p> <p>18 A. Anyway, there was not -- I was not asking</p> <p>19 her to moan about Gregg some more. I was asking her</p> <p>20 to show some interest and energy about the Forum as</p> <p>21 a whole, which she didn't do.</p> <p>22 Q. We can skip down. "Lisa and projects:</p> <p>23 Frankly, I don't think she knows enough yet.</p> <p>24 Perhaps with time. So I will suggest to her that</p>	Page 420

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	<p style="text-align: center;">---</p> <p>1 she take part in the project conference calls, be  2 cc'd on correspondence, and so forth. But, for now,  3 it's best to stick with Gregg. As you may recall,  4 with only one exception, all five other directors,  5 when asked in November, said they are fine working  6 with him, and the sixth had mild problems" [as  7 read]. So your response was --  8 A. No. That was me writing.  9 Q. What'd you say? This is you writing now?  10 A. It's me, yeah. I think --  11 Q. And then who's this?  12 A. Judging by the purple, that's Marnie.  13 Q. Okay. So is it correct that Marnie is the  14 purple, and you're the black in these --  15  16 (Indistinguishable cross-talk.)  17  18 BY MR. CARSON:  19 Q. Sorry?  20 A. It's the logic of this, yes. I don't  21 remember it, but looking at it now, yeah.  22 Q. So Marnie says, "My thoughts are not so  23 much as who likes him or who doesn't, but that it  24 would be natural for his work with the c4 to take</p>	<p style="text-align: center;">---</p> <p>1 mean that they're related by definition?  2 A. No.  3 MR. CAVALIER: Object to form.  4 BY MR. CARSON:  5 Q. I'm asking you, what does it mean?  6 A. It means that the c4 requires a c3, but  7 it's a separate organization legally and  8 organizationally. Gregg was gonna be there without  9 any staff whatsoever. All the staff was gonna  10 remain at the c3. He would be at the c4, but he  11 would be asked to help with fundraising for the --  12 and other activities for the c3 on a friendly basis.  13 Q. What does it mean that c4 is a derivative  14 of c3?  15 A. I just wrote it. Without the c3, it is  16 nothing. You have to have the c3 to justify the c4.  17 Q. Is that a legal thing? You're not allowed  18 to have a c4 without a c3?  19 A. Effectively, you can't have a c4 without a  20 c3. People who like the c3, who like what we're  21 doing, who have money that they are giving to  22 political candidates will -- who know who we are,  23 who know what we stand for will give to the c4  24 because they're confident of who we are and what we</p>	Page 423
	<p style="text-align: center;">Page 422</p> <p>1 precedence over his work with the c3." And you  2 said, "See above on this." "I do see him in what  3 you see -- I do see in him what you see, that he's  4 creative and has a lot of great ideas, but I believe  5 the focus that he does gives to the projects and the  6 c3 will mostly be centered around him" [as read].  7 Who's "him" there? Is that Gregg Roman?  8 A. Presumably.  9 Q. And up here, you wrote, "I expect it will  10 be largely or wholly the c4, but the c4 is a  11 derivative of the c3. Without the c3, it is  12 nothing. So Gregg understands he needs to help out.  13 Also, this justifies his high salary." So what do  14 you mean when you said that the c4 is a derivative  15 of the c3?  16 A. Without the c3, it is nothing.  17 Q. The c4 wouldn't exist without the c3.  18 A. Right.  19 Q. They're related, correct?  20 A. No.  21 MR. CAVALIER: Object to form.  22 BY MR. CARSON:  23 Q. Well, what does that mean? If one is --  24 if one can't exist without the other, doesn't that</p>	<p style="text-align: center;">---</p> <p>1 stand for. If they didn't know who we were and what  2 we stood for, they would never give money to the c4.  3 Q. Mr. Pipes, I don't know the answers to  4 these questions. I'm asking, like, if I wanted to  5 go open a c4, can I do that, or do I have to open a  6 c3 first?  7 A. You can do it, but you won't have any  8 takers because nobody knows who you are politically  9 and what you stand for and who you're gonna give  10 money to, who you're gonna support, whereas --  11 Q. So --  12 A. -- Forum has a profile, is known, and  13 therefore, if you like what the Middle East Forum is  14 doing, then the c4 is a way for you to entrust your  15 money because you don't follow -- you, the donor,  16 don't follow politics that closely, and you entrust  17 it to someone at a c4 who does follow it closely and  18 can figure out which races are important and which  19 ones are not and the like.  20 Q. So the c3 -- I'm sorry -- the c4 that  21 Mr. -- that you guys were considering starting was  22 going to be connected to the Middle East Forum c3?  23 A. No, not gonna be connected.  24 Q. "Without the c3, it is nothing." I guess</p>	Page 424

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1	<p>---</p> <p>I just don't understand what you mean.</p> <p>A. I just explained.</p> <p>Q. What's the -- go ahead.</p> <p>A. If you have -- in other words, if the -- if we go to potential donors and say, hi, you like the c3. You give money to the c3. Now, do you have another pot of money, not tax-deductible, that you give to candidates? Give some of it to us, and we'll direct it towards the campaigns -- not candidates, but campaigns -- that you will like because you like what we do, and we can do it because we're specialized. We know the ins and outs of these campaigns in a way you don't. So rather than you bumble around, giving away money you're not quite sure where to give it, give it to us, and we know what to do with it.</p> <p>Q. So who does the money go to, the c4 or the c3?</p> <p>A. Some money goes -- tax-deductible money goes to the c3, and non-tax-deductible money goes to the c4.</p> <p>Q. But the rule is that donations to a c4 are taxable, and donations to a c3 are not?</p> <p>A. Correct, as far as I understand it.</p>	1	<p>---</p> <p>MR. CAVALIER: Well, I don't think that's correct, but, I mean --</p> <p>MR. CARSON: It is correct.</p> <p>MR. CAVALIER: To the extent we're going a minute beyond 6:53 -- which I'm not saying we're gonna do -- we're gonna need a representation from you that the remaining time that you have is extraordinarily short. If you wanna go for another five minutes in lieu of filing your motion, maybe we can make an agreement, but if you're just going on willy-nilly until you feel like stopping, we're not doing that.</p> <p>BY MR. CARSON:</p> <p>Q. Why did you say it didn't say it was the derivative, because it said the c4 is a derivative of the c3, right?</p> <p>A. I've explained it twice. Yes.</p> <p>Q. So the c3 that you're referencing there is the Middle East Forum, correct?</p> <p>A. Yes.</p> <p>Q. So can you read this real quick, please? This will be my last question.</p> <p>A. Make it larger. Who is this to who?</p>
1	<p>---</p> <p>Q. Okay. So the c4 that you guys were considering opening was gonna be a derivative of the Middle East Forum, though, correct? That's what you meant by that?</p> <p>A. I believe it's 6:50, and I'm done.</p> <p>Q. My question's pending. The c4 that you guys were considering starting was going to be a derivative of the Middle East Forum; is that --</p> <p>MR. CAVALIER: I'm gonna object to form. "A derivative" is not what the document said.</p> <p>MR. CARSON: What'd it say?</p> <p>THE WITNESS: It's 6:50 p.m., and I believe I'm done.</p> <p>---</p> <p>(Indistinguishable cross-talk.)</p> <p>---</p> <p>THE WITNESS: What'd you say, Jon?</p> <p>MR. CAVALIER: 6:53.</p> <p>THE WITNESS: Oh, okay.</p> <p>MR. CARSON: I mean, if you guys really are gonna bounce out at exactly seven hours, I mean, I'm telling you right now, I'm gonna -- it's gonna be an issue with me because I gave you guys eight and a half hours with Lisa.</p>	1	<p>---</p> <p>Q. So I'll represent to you these are messages that you produced that are text messages between you and Marnie Meyer. Can you hear where she says that Gregg told Matt that he could destroy Daniel Pipes? Did you ever talk to Gregg about that?</p> <p>A. No, I didn't. I told you I don't -- I didn't take Matt's rumor mongering seriously. He was engaged in so much of this. It reminded me of another instance, and this is --</p> <p>Q. Okay. Here she says Gregg -- she says she just found out that Delaney was afraid to use the ladies' room because he would use the TV in his office to count how many times a day Eman went to the ladies' room. So that's why I asked if you ever spoke to Eman.</p> <p>A. No, I didn't speak to Eman about this. If she had a problem with it, she could've come to me. This is rumor mongering.</p> <p>Q. So --</p> <p>A. Marnie says to -- Marnie says to Eman says to me. I mean, what -- hello, if somebody has a problem, come to me. And, as you saw, I dealt with it expeditiously and rapidly. I cannot deal with</p>

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- - -

1 rumors.

2 Q. The last question is, is the money that  
3 you're talking about here the health insurance?

4 A. I don't know what this is referencing.

5 Q. Sorry?

6 A. I don't know what this is in reference to.

7 Complicated.

8 Q. Yeah. I don't know either. That's why  
9 I'm asking.10 A. I don't know what the 207,000 -- I don't  
11 know.12 Q. The gross is -- well, I guess we can ask  
13 Marnie. All right, whatever. It's 6:54. I'm done.  
14 That was easy, right, Mr. Pipes?

15 A. Oh, yeah.

16 THE COURT REPORTER: All right. We off  
17 the record?

18 MR. CAVALIER: No questions from me.

19 THE VIDEOGRAPHER: The time is 6:55 p.m.  
20 Eastern Time. We are now off the record.

21 Thank you, Counsels.

- - -

23 (Witness excused.)

- - -

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- - -

1 (Deposition concluded at 6:55 p.m.)

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1 C E R T I F I C A T E  
2 - - -  
34 I do hereby certify that I am a Notary  
5 Public in good standing, that the aforesaid  
6 testimony was taken before me, pursuant to notice,  
7 at the time and place indicated; that said deponent  
8 was by me duly sworn to tell the truth, the whole  
9 truth, and nothing but the truth; that the testimony  
of said deponent was correctly recorded in machine  
shorthand by me and thereafter transcribed under my  
supervision with computer-aided transcription; that  
the deposition is a true and correct record of the  
testimony given by the witness; and that I am  
neither of counsel nor kin to any party in said  
action, nor interested in the outcome thereof.  
1011 WITNESS my hand and official seal this  
12 23rd day of November, 2020.  
13  
14 <%signature%>  
15 \_\_\_\_\_  
16 Notary Public  
17  
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24

## INSTRUCTIONS TO WITNESS

Please read your deposition over carefully and make any necessary corrections. You should state the reason in the appropriate space on the errata sheet for any corrections that are made.

After doing so, please sign the errata sheet and date it.

You are signing same subject to the changes you have noted on the errata sheet, which will be attached to your deposition.

It is imperative that you return the original errata sheet to the deposing attorney within thirty (30) days of receipt of the deposition transcript by you. If you fail to do so, the deposition transcript may be deemed to be accurate and may be used in court.

1	E R R A T A		
2	- - -		
3	PAGE	LINE	CHANGE
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5	Reason for		
6	Change:	-----	-----
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23	Reason for		
24	Change	-----	-----

## ACKNOWLEDGMENT OF DEPONENT

I, \_\_\_\_\_, do hereby certify that I have read the foregoing pages 1 to \_\_\_ and that the same is a correct transcription of the answers given by me to the questions therein propounded, except for the corrections or changes in form or substance, if any, noted on the attached Errata Sheet.

DATE SIGNATURE

Subscribed and sworn to before  
me this day of , 20 .

My commission expires:

## Notary Public

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comparing (2)	confirming (3)	conversation (12)	crisis (2)
compensate (1)	confirms (2)	conversations (4)	critical (4)
compensated (2)	confront (1)	convinced (1)	criticisms (1)
complain (21)	confronted (2)	convulses (1)	crossed (1)
complainants (3)	confusing (1)	COO (1)	crosses (1)
complained (21)	congratulate (2)	cooperate (1)	cross-talk (98)
complaining (15)	Congratulations (1)	copied (1)	crowded (1)
complains (2)	Congress (2)	copying (1)	crucial (1)
complaint (59)	conjunction (1)	core (1)	cunt (1)
complaints (77)	connected (8)	corner (1)	current (5)
complete (6)	connection (8)	corporate (12)	curtailed (1)
completed (3)	connived (2)	correct (163)	custody (1)
completely (6)	consensual (2)	corrected (1)	cut (2)

cuts (1)	definitely (12)	different (29)	distance (1)
cutting (1)	definition (2)	differently (1)	distancing (1)
< D >	definitions (1)	difficult (9)	distinction (1)
D.C. (3)	Delaney (10)	diminished (1)	distinctly (1)
D.C. (1)	delve (1)	dinner (1)	distorted (1)
D0000017 (1)	demand (4)	direct (5)	distracted (1)
D000024 (1)	demanded (1)	directed (2)	DISTRICT (4)
D000037 (1)	demanding (1)	directive (1)	disturbing (2)
da (9)	den (7)	directives (1)	divided (1)
dad (3)	denial (1)	directly (11)	doc (1)
Daily (1)	denied (7)	director (42)	docket (1)
damage (1)	denies (2)	directors (13)	docking (1)
damages (9)	denounces (1)	directorship (4)	docks (1)
damaging (1)	denying (1)	directs (1)	Docs (3)
damn (1)	dep (1)	disadvantage (1)	document (103)
Dan (2)	depends (4)	disadvantaged (1)	documenting (1)
dangers (1)	deponent (3)	disagree (8)	documents (49)
DANIEL (66)	deponent's (1)	Disagreement (1)	document's (1)
Daniel, (1)	deposed (2)	disappear (5)	doing (41)
Danny (11)	deposing (1)	disappeared (3)	dollars (4)
date (15)	deposition (36)	disappointed (5)	dominated (1)
dated (10)	depositions (4)	discern (1)	donated (1)
dates (3)	depreciation (1)	discipline (1)	donations (7)
day (31)	DEPUTY (11)	disclose (2)	donor (9)
days (7)	DEREK (11)	disclosed (1)	donors (10)
day-to-day (1)	derivative (8)	disclosures (1)	door (4)
deadlines (2)	describe (4)	discontent (1)	double (1)
deal (34)	described (2)	discovery (8)	doubt (1)
dealing (7)	describes (1)	discrepancy (3)	doubts (4)
dealt (27)	describing (2)	discrimination (11)	download (1)
Dear (1)	DESCRIPTION (8)	discuss (7)	downs (1)
deceit (10)	designed (1)	discussed (8)	downstairs (1)
deceitful (7)	despite (2)	discussing (3)	Dr (1)
decide (5)	destroy (4)	discussion (18)	draft (5)
decided (20)	detail (9)	discussions (8)	dragged (1)
decides (2)	detailed (2)	disguised (1)	drastic (1)
decision (15)	details (5)	disgust (1)	drill (2)
decisions (6)	determination (3)	dishonest (1)	drinks (1)
declaration (1)	determine (6)	disinvited (2)	drive (4)
decrease (1)	determined (1)	dislike (2)	dropped (1)
deem (1)	determining (1)	disliking (1)	Due (9)
deemed (1)	detrimental (1)	dismay (1)	duly (2)
de-emphasize (1)	development (5)	disparages (1)	duties (2)
deep (1)	developments (1)	displeased (2)	duty (5)
Defendant (8)	devote (1)	displeasure (1)	dynamic (1)
Defendants (2)	devoted (2)	dispute (1)	< E >
defense (2)	dial (1)	disregarded (1)	eager (1)
define (1)	difference (7)	disrupted (1)	ear (2)
	differences (1)	dissuaded (1)	

earlier (17)	engage (8)	example (9)	fail (1)
early (16)	engaged (7)	examples (1)	failure (1)
earned (2)	engages (1)	excellent (1)	Fair (5)
easily (2)	English (2)	exception (3)	fairly (1)
EAST (159)	enhances (1)	exchanges (1)	fall (2)
EASTERN (8)	enormous (3)	excluded (3)	falls (1)
easy (2)	entangled (2)	excluding (1)	false (16)
editorial (1)	enter (1)	excuse (5)	falsehood (2)
editorializing (1)	entered (3)	excused (1)	fantasy (1)
EEOC (5)	enthusiastic (2)	executive (2)	far (20)
eerily (1)	enthusiastically (1)	Exhibit (10)	far-reaching (1)
effect (5)	entices (1)	exhibition (2)	faster (1)
effectively (4)	entire (14)	EXHIBITS (4)	father (10)
effects (1)	entirely (10)	exist (3)	fault (3)
efficacy (1)	entitled (2)	existed (1)	favor (1)
efforts (1)	entity (2)	existence (1)	favors (2)
eight (23)	entrust (2)	exists (1)	fear (1)
eight-hundred-some (1)	environment (1)	expand (1)	feared (1)
either (12)	equal (1)	expect (1)	February (4)
ejected (3)	equals (1)	expeditious (1)	fed (2)
ejected, (1)	equate (1)	expeditiously (6)	Federal (2)
elaborate (1)	era (2)	expense (7)	feel (9)
elaborated (2)	Erica (1)	expenses (6)	feeling (2)
elaboration (1)	errata (5)	experience (2)	feelings (1)
elected (5)	errors (4)	experienced (1)	feels (1)
electronic (4)	escalation (1)	expert (2)	feet (2)
Email (98)	especially (3)	expires (1)	fell (1)
Emails (40)	ESQUIRE (5)	explain (12)	felt (5)
Eman (10)	essentially (6)	explained (9)	female (12)
embarrass (1)	EST (1)	explaining (1)	fiduciary (1)
embarrassed (1)	et (5)	explanation (2)	fight (2)
emergency (1)	ethical (1)	explicitly (1)	figuratively (1)
emotions (1)	evening (3)	exposed (1)	figure (13)
emphasis (1)	events (5)	exposition (1)	figured (1)
employee (25)	eventually (1)	exposure (1)	figuring (2)
employees (38)	Everest (2)	expound (1)	file (6)
employee's (2)	everybody (9)	expressed (2)	filed (7)
employment (17)	everybody's (1)	extensive (2)	filings (2)
en (1)	everyone's (7)	extent (16)	fill (2)
encounter (1)	everything, (1)	external (1)	filling (1)
ended (6)	everything's (2)	extra (3)	final (1)
Endless (5)	evidence (10)	extraordinarily (1)	finance (1)
endorse (3)	exact (11)	< F >	finances (5)
endorsed (1)	exactly (14)	face (15)	financially (1)
endure (2)	exaggerate (1)	faces (1)	find (24)
energy (1)	exaggerating (1)	facilitate (1)	finding (5)
enforce (1)	EXAMINATION (1)	fact (24)	finds (1)
enforcing (1)	examined (1)	facts (2)	fine (34)

finished (17)	frankly (3)	glad (2)	handwrote (2)
finishing (2)	fraternizing (1)	go (130)	Hang (1)
<b>FINK</b> (8)	fraudulent (1)	god (1)	happen (12)
fire (11)	free (5)	goes (12)	happened (48)
fireable (1)	frequent (1)	going (61)	happening (2)
fired (10)	friendly (1)	<b>GOLD</b> (2)	happens (2)
firing (2)	friends (4)	gonna (253)	happiness (1)
<b>Firm</b> (4)	friendship (2)	good (22)	happy (22)
first (58)	friendships (2)	Goodman (15)	harass (2)
fit (3)	front (19)	Gotcha (1)	harassed (4)
five (23)	fuckin (1)	gotta (23)	harasser (1)
five-minute (2)	full (8)	governance (1)	harassment (41)
fix (1)	full-bloomed (1)	governing (1)	hard (10)
fixing (1)	full-blown (1)	<b>Government's</b> (1)	harmful (6)
focus (5)	full-time (1)	Governors (21)	harsh (1)
focused (2)	fully (2)	GR (1)	hating (3)
follow (4)	fun (2)	Grace (3)	have, (1)
followed (1)	fundraising (3)	grant (1)	head (13)
following (8)	funds (3)	granted (2)	health (11)
follows (1)	funny (1)	<b>Grayson</b> (1)	hear (74)
foot (3)	further (9)	great (9)	heard (52)
footing (1)	future (12)	green (3)	hearing (4)
force (3)	future, (1)	Gregg (382)	hearsay (1)
forced (2)	< G >	Gregg's (30)	heart (1)
forcing (4)	<b>Gabrielle</b> (24)	grievances (1)	he'd (1)
foregoing (1)	gain (1)	gross (2)	held (9)
forensic (1)	<b>gala</b> (1)	ground (1)	hell (1)
<b>Forever</b> (1)	<b>Gambill</b> (3)	grounds (4)	Hello (2)
forget (4)	games (7)	<b>GROUP</b> (12)	help (17)
Forgetting (1)	Gary (5)	<b>Guardian</b> (2)	helpful (1)
forgot (2)	gathering (1)	guess (17)	helping (1)
forgotten (1)	gearing (1)	guesses (1)	helps (1)
form (199)	<b>G-E-L</b> (1)	gunning (3)	henceforth (2)
former (1)	gender (2)	guy (3)	here, (1)
forth (12)	general (3)	guys (39)	heroes (2)
<b>FORUM</b> (166)	generalizations (1)	< H >	hesitant (1)
Forum's (3)	generally (4)	hair (1)	Hey (7)
Forum-wide (1)	germane (1)	half (11)	hi (1)
forward (6)	getting (21)	halfway (1)	hid (8)
forward, (1)	giant (1)	hand (14)	hide (2)
forwarded (1)	gifted (1)	handed (3)	hiding (6)
found (18)	gig (1)	handling (1)	high (3)
foundation (32)	ginned (1)	<b>hand-in-hand</b> (3)	higher (3)
foundations (3)	gist (1)	handle (1)	highest (1)
Four (12)	give (51)	handled (5)	highlight (2)
four-page (1)	given (6)	handles (2)	highlighted (2)
fours (1)	gives (1)	hands (4)	highly (3)
fourth (2)	giving (12)	<b>handwritten</b> (8)	hint (1)
Frank (4)			hire (5)

hired (1)	imply (1)	informed (1)	interrogatory (1)
hiring (2)	implying (2)	informing (1)	interrupt (26)
history (4)	impolite (1)	inherent (1)	interrupted (7)
hit (8)	import (1)	initial (8)	interrupting (12)
Hm (1)	important (17)	initially (4)	interruption (1)
Hold (20)	importantly (1)	initiate (1)	interruptions (1)
Hollin (1)	imposed (1)	initiated (9)	interview (11)
Hollin's (1)	impossible (1)	initiation (2)	interviewed (9)
honest (1)	improprieties (1)	initiative (3)	interviews (2)
honestly (2)	impugn (1)	in-office (4)	intimate (1)
honesty (1)	inaccurate (1)	inquire (3)	introverted (1)
hope (2)	inadvertent (1)	inquired (1)	invest (1)
hostilities (6)	inappropriate (14)	inquiries (1)	invested (2)
hotbed (1)	inappropriately (1)	inquiry (3)	investigate (18)
hotel (8)	Inaudible (57)	inquisitive (1)	investigated (17)
hour (9)	incessantly (1)	ins (1)	investigating (4)
hours (13)	incident (8)	instance (3)	investigation (23)
house (1)	incidents (1)	instances (4)	Investigator (5)
How'd (1)	include (4)	institution (1)	investment (1)
huge (1)	included (3)	instruct (3)	invite (5)
Huh (1)	including (8)	instructed (1)	invited (7)
human (5)	income (2)	instructing (4)	involve (2)
hun (1)	incomplete (6)	instruction (4)	Involved (12)
hundred (9)	incomprehensible (2)	instructions (7)	involves (1)
husband (2)	inconsist (1)	instructs (1)	irony (1)
hush (1)	inconsistencies (2)	insurance (7)	irrelevant (2)
hypothetical (17)	inconsistency (4)	intellectual (1)	IRS (1)
hypotheticals (8)	inconsistent (3)	intend (1)	Israel (28)
< I >	increase, (1)	intense (3)	issue (22)
idea (28)	increased (4)	intensely (2)	issued (2)
ideal (1)	incredible (1)	intention (8)	issues (22)
ideas (2)	incumbent (1)	intentionally (1)	issues, (1)
identify (4)	INDEX (1)	intentions (3)	it'd (1)
ignorance (1)	indicate (5)	intents (1)	it'll (1)
ill (1)	indicated (4)	inter (1)	its (5)
illegal (6)	indicates (5)	interaction (1)	< J >
imaginary (2)	indicating (1)	interactions (2)	Jack (1)
imagination (3)	indication (4)	intercourse (1)	James (4)
imagine (1)	indiscretions (1)	interest (4)	January (3)
Imagined (2)	Indistinguishable (98)	interested (7)	jcavalier@cozen.com (1)
immediately (6)	individual (2)	interfere (1)	Jeannine (1)
immunity (3)	individually (1)	interject (2)	job (44)
imperative (1)	individuals (4)	intern (5)	jobs (4)
implausible (1)	indulgence (1)	internal (4)	Jon (38)
implemented (1)	inflicted (1)	interpersonal (1)	JONATHAN (1)
implicate (1)	influence (1)	interpret (3)	Judge (32)
implicates (1)	inform (1)	interpretation (1)	Judging (1)
implication (1)	information (33)	interpreted (2)	
	informational (1)	interrogatories (3)	

<b>judgment</b> (3)	<b>Laura</b> (9)	<b>likes</b> (1)	<b>lunch</b> (2)
<b>July</b> (1)	<b>Laura's</b> (1)	<b>Likewise</b> (1)	<b>lure</b> (3)
<b>jumbled</b> (1)	<b>LAW</b> (31)	<b>limit</b> (2)	<b>lured</b> (2)
<b>jump</b> (1)	<b>law,</b> (1)	<b>limited</b> (2)	<b>lures</b> (1)
<b>June</b> (20)	<b>lawbooks</b> (3)	<b>limiting</b> (1)	<b>lying</b> (2)
<b>junkie</b> (1)	<b>Lawrence</b> (2)	<b>line</b> (5)	
<b>jury</b> (3)	<b>laws</b> (4)	<b>lines</b> (5)	<b>&lt; M &gt;</b>
<b>justifies</b> (1)	<b>lawsuit</b> (1)	<b>linked</b> (1)	<b>machine</b> (1)
<b>justify</b> (1)	<b>lawsuits</b> (9)	<b>liquidated</b> (1)	<b>Macs</b> (1)
	<b>lawyer</b> (15)	<b>LISA</b> (145)	<b>magic</b> (3)
<b>&lt; K &gt;</b>	<b>lawyers</b> (6)	<b>Lisa's</b> (3)	<b>magically</b> (1)
<b>keep</b> (43)	<b>Lea</b> (21)	<b>list</b> (20)	<b>main</b> (1)
<b>keeps</b> (3)	<b>lead</b> (2)	<b>list,</b> (1)	<b>maintain</b> (7)
<b>Ken</b> (1)	<b>leadership</b> (2)	<b>listed</b> (12)	<b>maintained</b> (4)
<b>kept</b> (5)	<b>learn</b> (3)	<b>listen</b> (10)	<b>maintains</b> (4)
<b>key</b> (14)	<b>learned</b> (15)	<b>listened</b> (5)	<b>major</b> (3)
<b>kids</b> (3)	<b>learning</b> (1)	<b>lists</b> (2)	<b>maker</b> (2)
<b>kill</b> (2)	<b>leave</b> (8)	<b>literally</b> (4)	<b>make-work</b> (1)
<b>killer</b> (1)	<b>leaving</b> (1)	<b>little</b> (18)	<b>making</b> (19)
<b>kin</b> (1)	<b>led</b> (1)	<b>live</b> (1)	<b>man</b> (6)
<b>kind</b> (8)	<b>Lee</b> (8)	<b>lives</b> (11)	<b>managed</b> (1)
<b>kinds</b> (1)	<b>leery</b> (1)	<b>load</b> (1)	<b>management</b> (19)
<b>knew</b> (28)	<b>Lee's</b> (1)	<b>loaded</b> (3)	<b>manager</b> (9)
<b>knife</b> (1)	<b>leeway</b> (2)	<b>loading</b> (2)	<b>managing</b> (2)
<b>know</b> (416)	<b>left</b> (11)	<b>loathed</b> (1)	<b>Mandeles</b> (1)
<b>know,</b> (3)	<b>legal</b> (35)	<b>Lobitz</b> (1)	<b>manipulation</b> (1)
<b>knowing</b> (5)	<b>legalities</b> (6)	<b>logic</b> (1)	<b>manipulative</b> (6)
<b>knowledge</b> (4)	<b>legally</b> (4)	<b>long</b> (26)	<b>manner</b> (2)
<b>known</b> (7)	<b>legitimate</b> (2)	<b>longer</b> (5)	<b>manual</b> (4)
<b>knows</b> (11)	<b>LEIGH</b> (1)	<b>look</b> (59)	<b>manufactured</b> (1)
	<b>length</b> (1)	<b>looked</b> (21)	<b>MARC</b> (25)
<b>&lt; L &gt;</b>	<b>lengths</b> (1)	<b>looking</b> (16)	<b>March</b> (39)
<b>labeled</b> (1)	<b>lesson</b> (4)	<b>looks</b> (9)	<b>mark</b> (3)
<b>labeling</b> (1)	<b>Letter</b> (24)	<b>lose</b> (2)	<b>marked</b> (4)
<b>lacerating</b> (1)	<b>letters</b> (1)	<b>lose-lose</b> (1)	<b>Market</b> (4)
<b>lack</b> (12)	<b>letting</b> (5)	<b>losing</b> (1)	<b>Marnie</b> (130)
<b>ladies</b> (2)	<b>Levy</b> (5)	<b>loss</b> (4)	<b>Marnie's</b> (6)
<b>lap</b> (9)	<b>Levy's</b> (1)	<b>lost</b> (5)	<b>masse</b> (1)
<b>laptop</b> (21)	<b>liability</b> (1)	<b>lot</b> (18)	<b>Matt</b> (77)
<b>laptop,</b> (1)	<b>liar</b> (3)	<b>lots</b> (7)	<b>matter</b> (26)
<b>laptops</b> (1)	<b>Liberty</b> (1)	<b>loud</b> (5)	<b>mattered</b> (1)
<b>Lara</b> (9)	<b>lie</b> (11)	<b>louder</b> (2)	<b>matters</b> (7)
<b>Lara's</b> (2)	<b>lied</b> (6)	<b>lousy</b> (1)	<b>Matthew</b> (1)
<b>large</b> (2)	<b>lies</b> (10)	<b>love</b> (1)	<b>Matt's</b> (8)
<b>largely</b> (1)	<b>lieu</b> (1)	<b>loving</b> (1)	<b>McNulty</b> (33)
<b>larger</b> (2)	<b>life</b> (17)	<b>loyalty</b> (3)	<b>McNulty's</b> (2)
<b>large-scale</b> (3)	<b>life,</b> (2)	<b>luck</b> (2)	<b>me,</b> (2)
<b>late</b> (6)	<b>lifted</b> (3)	<b>ludicrous</b> (2)	<b>mean</b> (94)
<b>Laterally</b> (1)	<b>lights</b> (1)	<b>LUKE</b> (4)	<b>means</b> (9)

meant (9)	minutes (11)	names (21)	numbers (10)
media (16)	mis (2)	name's (1)	< O >
mediate (1)	misappropriated (1)	narrative (1)	oath (4)
mediated (2)	misappropriation (1)	Nasty (9)	Object (242)
medical (1)	misbehaved (1)	national (1)	objecting (7)
medium (2)	misbehavior (5)	natural (2)	objection (32)
meet (1)	miscategorization (1)	naturally (1)	objections (8)
meeting (22)	mischaracterization (6)	nature (10)	objection's (1)
meetings (6)	mischaracterized (1)	NDA (6)	observe (1)
MEF (29)	mischaracterizing (3)	NDA, (1)	Obviously (4)
MEF, (1)	misconduct (15)	NDAs (1)	occasions (2)
Mekelburg (5)	misconstrued (1)	necessarily (1)	occurred (3)
member (4)	miserable (1)	necessary (2)	O'CONNOR (3)
members (8)	misread (1)	need (28)	October (3)
memo (14)	misrepresentation (1)	needed (3)	odd (1)
Memorandum (3)	mistake (8)	needs (8)	offer (4)
memorialize (1)	mistakes (6)	Neither (2)	offered (4)
memorialized (1)	misuse (1)	nest (2)	offers (1)
memories (1)	mitigated (8)	net (3)	office (64)
memorize (3)	mix (3)	never (57)	officer (3)
memorized (1)	mixed (1)	new (21)	officers (9)
memory (2)	Mm-hmm (3)	news (2)	Officers, (2)
men (4)	MO (1)	newspapers (1)	offices (3)
mental (4)	moan (1)	nice (2)	official (7)
mention (3)	moaning (6)	night (3)	Oh (20)
MENTIONED (9)	moans (1)	nine (4)	Okay (169)
mentions (1)	moment (5)	no, (2)	old (10)
Merville (19)	money (70)	Nobody's (1)	omitting (1)
mess (1)	mongering (2)	nods (1)	omniscience (1)
message (2)	Month (7)	noises (1)	omniscient (1)
Messages (20)	months (32)	noncommittal (1)	once (6)
messaging (1)	morning (5)	Nonprofit (5)	one-on-one (2)
met (7)	mother (7)	nonprofits (2)	ones (5)
metadata (3)	motion (7)	nonresponsive (5)	one's (2)
Meyer (44)	mouth (1)	nonresponsiveness (1)	one-syllable (1)
MIDDLE (165)	mouths (1)	nonsense (1)	one-to-one (1)
might've (4)	move (21)	non-tax-deductible (1)	ongoing (2)
mild (1)	moved (11)	Nope (1)	online (1)
Miller (1)	moving (4)	normal (3)	open (11)
Miller's (1)	multiple (3)	Notary (4)	open-ended (2)
million (24)	murder (3)	note (19)	opening (5)
millions (1)	muted (1)	noted (5)	operations (2)
mind (7)	mutual (1)	notes (8)	opinion (1)
minds (2)	< N >	Notice (2)	opportunity (8)
mine (3)	nail (1)	notify (1)	opposing (1)
minimizing (1)	name (39)	noting (1)	opposite (1)
minimum (1)	named (1)	November (143)	order (25)
minor (10)		now, (1)	orders (3)
minute (15)		NUMBER (22)	

Ordinance (2)	passwords (1)	picture (7)	PNC (1)
ordinary (1)	pasted (1)	pictures (1)	poetic (2)
organization (27)	patently (1)	piling (1)	point (44)
organizationally (1)	path (1)	pillow (1)	point-blank (1)
organizations (4)	patience (1)	pin (1)	pointed (3)
organize (1)	Patricia (14)	PIPES (155)	pointedly (1)
Original (2)	Patricia's (2)	Pipes-1 (3)	pointing (4)
originally (1)	pattern (3)	Pipes-10 (1)	points (3)
other's (3)	pay (19)	Pipes-11 (1)	policy (19)
otherwise, (1)	payday (1)	Pipes-12 (1)	political (10)
outcome (2)	paying (5)	Pipes-13 (1)	politically (1)
outline (1)	payment (1)	Pipes-14 (1)	politics (7)
outlining (1)	payments (2)	Pipes-15 (1)	pool (1)
out-of-office (1)	pending (25)	Pipes-16 (1)	poor (1)
outrageous (1)	penis (6)	Pipes-17 (1)	pop (7)
outs (1)	PENNSYLVANIA (4)	Pipes-18 (1)	portfolio (3)
Outside (4)	people (55)	Pipes-19 (1)	portray (1)
over' (1)	people's (5)	Pipes-2 (3)	portrayed (3)
oversee (2)	percent (9)	Pipes-20 (1)	Posepiak (1)
oversight (2)	perfect (2)	Pipes-21 (1)	position (31)
owe (1)	perfectly (3)	Pipes-22 (1)	positioned (3)
owed (3)	perform (1)	Pipes-23 (1)	positions (1)
< P >	period (7)	Pipes-24 (1)	positive (1)
P.C (1)	perks (3)	Pipes-25 (1)	possession (4)
p.m (16)	permission (13)	Pipes-26 (1)	possibility (1)
PA (3)	permitted (8)	Pipes-27 (1)	possible (5)
packed (1)	person (33)	Pipes-28 (1)	possibly (1)
PAGE (16)	personal (17)	Pipes-29 (1)	Post (5)
pages (7)	personalities (1)	Pipes-3 (3)	pot (1)
paid (42)	personality (4)	Pipes-4 (3)	potential (2)
panoply (1)	Personally (5)	Pipes-5 (1)	potentially (2)
paper (1)	personnel (5)	Pipes-6 (1)	power (5)
paperwork (2)	persons (2)	Pipes-7 (2)	powers (1)
paragraph (4)	pertained (1)	Pipes-8 (3)	Practice (3)
parameters (6)	pertinent (8)	Pipes-9 (1)	pre (6)
paraphrased (1)	perverted (1)	Place (30)	pre-authorized (2)
part (38)	Philadelphia (8)	Plaintiff (6)	precedence (1)
partially (2)	Philly (1)	plaintiffs (7)	precise (1)
participant (1)	phone (16)	plan (1)	precisely (1)
participate (1)	phonetic (5)	planning (4)	Predated (1)
particular (6)	photograph (1)	plate (1)	predator (1)
particularized (1)	photographs (2)	play (1)	pre-March (1)
particularly (7)	photos (1)	played (4)	preparation (1)
parties (3)	PHRA (2)	playing (7)	prepared (4)
parts (1)	phrase (1)	plea (1)	Preparing (3)
party (2)	physical (2)	pleasantries (1)	presence (2)
pass (1)	physically (4)	please (39)	PRESENT (17)
passed (1)	pick (2)	pleased (4)	presented (1)
	picks (1)	plenty (2)	presenting (1)

presently (1)	propositions (1)	quickly (5)	recognize (3)
presents (1)	propounded (1)	quid (4)	recollection (1)
preservation (1)	Prosser (2)	quiet (5)	reconcile (1)
President (23)	protect (5)	quit (1)	record (76)
press (1)	protected (2)	quite (4)	recorded (3)
Presumably (4)	protection (1)	quiver (1)	Recording (31)
pretend (3)	protest (1)	quizzed (3)	records (9)
pretended (2)	protested (1)	quo (3)	recruit (2)
pretty (4)	protocol (1)	quote (6)	red (1)
prevent (2)	protocols (1)	quoted (3)	reduce (2)
previous (4)	prove (2)	quotes (1)	refer (4)
previously (2)	proven (2)	< R >	reference (4)
principals (3)	provide (14)	races (1)	referenced (2)
printout (1)	provided (3)	radical (2)	references (1)
prior (8)	providence (2)	radically (1)	referencing (11)
priority (1)	provides (1)	raise (8)	referred (2)
private (5)	providing (1)	raised (5)	referring (16)
privilege (17)	proxy (1)	raising (1)	reflect (1)
privileged (4)	psychological (5)	random (2)	reflects (1)
privileged, (1)	psychology (1)	Range (5)	refreshers (1)
privileges (1)	Public (10)	rapidly (1)	refusal (1)
pro (4)	publication (1)	rates (1)	refused (1)
probably (6)	public-elected (1)	Raymond (4)	refusing (1)
probation (4)	publicly (1)	reach (2)	regard (4)
probationary (6)	pull (3)	reached (3)	Regarding (6)
problem (45)	pulled (8)	reacted (3)	regime (1)
problem, (1)	pulling (1)	read (115)	regularly (1)
problems (25)	pulls (1)	reader (2)	regularly, (1)
Procedure (3)	punished (1)	reading (5)	reimburse (3)
proceed (3)	punitive (9)	reads (1)	reimbursed (5)
proceeded (1)	purchased (2)	ready (13)	reimbursement (1)
proceeding (5)	purple (2)	real (3)	reimbursing (1)
process (6)	purpose (2)	realize (1)	reinstated (3)
produce (6)	purposes (2)	realized (5)	reiterate (1)
produced (7)	pursuant (2)	really (26)	reiterated (1)
producing (2)	pursue (2)	rearrange (1)	rejoined (3)
product (1)	purveying (1)	reason (39)	relate (2)
production (7)	purview (3)	reasoning (1)	related (13)
Professional (1)	push (2)	reasons (9)	relating (1)
profile (1)	put (39)	Rebel (2)	relations (10)
profit (1)	puts (1)	recall (11)	relationship (12)
Profusely (1)	putting (3)	receipt (1)	relationships (1)
prohibit (2)	< Q >	receipts (1)	relevancy (1)
prohibiting (1)	question (246)	receive (5)	relevant (6)
project (10)	questioning (2)	received (12)	relief (1)
projects (6)	questions (65)	receiving (4)	reluctance (1)
prominent (1)	question's (2)	recess (5)	rely (1)
promise (2)	quick (3)	recite (2)	rem (1)
promptly (1)			remain (5)

remainder (1)	resolve (3)	roughly (3)	secret (5)
remained (2)	resources (5)	round (4)	secretary (4)
remaining (1)	respect (1)	rub (1)	secrets (7)
remains (2)	respective (1)	rule (5)	section (8)
remember (113)	respond (3)	Rules (3)	see (99)
remember, (1)	responded (4)	ruling (1)	seeing (3)
remind (5)	responding (6)	rumor (38)	seek (1)
reminded (1)	responds (2)	rumor, (1)	seeks (1)
remotely (4)	response (20)	rumors (8)	seen (13)
remove (1)	responses (5)	run (2)	select (2)
removed (11)	responsibilities (2)	running (1)	self-evident (1)
removing (1)	responsibility (10)	ruse (1)	Self-explanatory (1)
remuneration (3)	responsible (5)	< S >	self-reporting (1)
repeat (2)	responsive (10)	sabotage (1)	send (16)
repeated (1)	rest (2)	safe (4)	sending (2)
repeatedly (3)	restated (1)	safeguards (1)	sense (6)
repeating (3)	restrictions (4)	safety (4)	sensitive (4)
repercussions (5)	resulting (1)	sake (2)	sent (50)
rephrase (1)	resume (2)	salary (10)	sentence (11)
replace (1)	resumed (1)	Samantha (1)	separate (12)
replied (2)	retain (1)	sat (2)	September (1)
reply (2)	retained (1)	satchel (1)	sergeant (1)
report (29)	retaliate (2)	satisfaction (12)	serial (1)
reported (12)	retaliated (1)	satisfactorily (4)	serious (5)
Reporter (79)	retaliation (22)	satisfied (4)	Seriously (12)
reporters (2)	retold (1)	saw (17)	seriousness (1)
Reporting (16)	return (11)	saying (87)	serve (1)
reports (14)	returned (2)	says (63)	Serving (1)
represent (14)	returning (2)	scared (3)	session (2)
representation (1)	reuse (1)	scene (1)	set (4)
Representative (1)	review (9)	schedule (1)	SETH (64)
represented (4)	reviewed (3)	scholarship (1)	seth@dereksmithlaw.c
Representing (7)	reviewing (1)	scope (2)	om (1)
reprieve (5)	reviews (1)	screamed (1)	setting (2)
Republican (3)	revise (1)	screen (9)	settle (1)
reputation (4)	RICO (6)	Screenshot (5)	settled (1)
request (12)	rid (1)	screenshots (2)	seven (14)
requested (3)	ridiculous (8)	scroll (2)	seventh (1)
requesting (1)	RIESER (24)	scrolled (1)	severely (2)
requests (6)	right (344)	scrolling (1)	sex (28)
require (2)	rights (2)	scuttle (3)	sexual (74)
required (1)	rises (1)	scuttled (1)	sexually (7)
requirements (1)	Robinson (12)	seal (1)	Shardelle (1)
requires (2)	Robinson's (1)	sealing (1)	S-H-A-R-D-E-L-L-E
research (15)	rogue (2)	search (1)	(1)
reserved (1)	role (7)	second (25)	share (3)
resignation (1)	Roman (124)	secondary (1)	shared (5)
resolution (6)	Roman's (16)	secondly (6)	Shargel (3)
resolutions (1)	room (20)		sharing (1)

she'd (4)	sleep (4)	spread (1)	stopped (2)
sheet (5)	slightly (1)	spreadsheet (1)	stopping (3)
she'll (1)	slit (4)	spring (7)	stories (7)
Shikunov (1)	slower (1)	stab (3)	story (12)
shoddy (1)	small (1)	Stacey (2)	strange (2)
short (2)	smaller (1)	staff (28)	strategy (3)
Shorthand (2)	smiles (1)	staffer (1)	Street (5)
shortly (2)	SMITH (12)	staffers (1)	stretched (1)
shot (1)	snarky (1)	stamp (1)	strike (17)
shoulder (1)	social (5)	stand (7)	striking (1)
should've (5)	software (1)	standing (4)	strong (1)
show (25)	solicitation (1)	standoffish (1)	structure (8)
showed (10)	solution (2)	standoffish, (1)	stuck (1)
shown (2)	solutions (2)	stands (1)	stuff (9)
shows (2)	solved (3)	start (10)	stupid (2)
shrugs (1)	somebody (3)	started (19)	style (10)
shuffling (2)	someone's (1)	starting (6)	subject (10)
sic (7)	something's (1)	state (8)	subjected (7)
side (4)	sorry (56)	stated (2)	subjecting (1)
SIDNEY (2)	sort (5)	statement (15)	subjects (1)
sign (9)	sorts (19)	statements (32)	submit (5)
signaled (1)	sought (1)	STATES (6)	submitted (5)
signature (2)	sound (1)	stating (1)	Subscribed (1)
signed (16)	sounds (1)	Station (2)	subsequently (4)
significant (3)	source (2)	stations (2)	substance (1)
signing (2)	south (1)	status (4)	substantial (1)
similar (4)	space (1)	statute (5)	substantive (1)
simple (15)	speak (36)	statutes (1)	successful (3)
simply (5)	speakers (1)	stay (6)	successfully (1)
simultaneously (1)	speaking (13)	staying (1)	sucks (1)
single (12)	speaks (2)	steal (2)	sudden (2)
single-word (1)	special (3)	stealing (1)	suddenly (1)
Sir (7)	specialist (7)	stenographic (3)	sue (1)
sit (5)	specialize (1)	stenographically (1)	sued (1)
sitting (8)	specialized (3)	step (4)	suffices (1)
situation (7)	specific (16)	steps (5)	suggest (4)
situations (2)	specifically (6)	Steve (2)	suggested (4)
six (9)	specifics (14)	Steven (3)	suggesting (3)
sixth (1)	speculating (5)	stick (3)	suggestion (2)
Sixty-two (1)	speculation (1)	stipulate (1)	suggests (1)
skeptical (4)	speech (5)	stipulated (1)	Suite (2)
sketched (1)	speed (1)	stipulations (1)	sum (1)
skilled (2)	spend (8)	stir (1)	summary (2)
skills (1)	spending (2)	stock (1)	Sunday (2)
skip (1)	spent (5)	stocks (1)	supervise (3)
Slack (2)	spew (1)	stole (11)	supervisee (3)
Slacks (1)	splitting (1)	stolen (7)	supervising (1)
slander (2)	spoke (13)	stood (1)	supervision (1)
slandering (1)	spoken (2)	stop (27)	supervisor (13)

supervisors (1)	termination (1)	timely (1)	truly (1)
support (2)	terms (4)	times (12)	Trust (1)
supposed (10)	terrible (3)	time's (1)	truth (11)
supposedly (1)	testified (16)	tissue (5)	truthful (1)
sure (56)	testify (12)	title (14)	truthfully (1)
surprise (4)	testifying (8)	today (66)	try (24)
surprised (1)	testimonies (1)	Today's (1)	trying (26)
surprises (6)	Testimony (45)	told (80)	Tuesday (3)
surprising (1)	Text (20)	Tommy (13)	Turn (10)
suspicious (1)	texting (1)	tomorrow (3)	turned (9)
swear (3)	texts (9)	tooth (1)	turning (2)
sworn (4)	Thank (27)	top (7)	turns (1)
sympathize (1)	Thanks (5)	topic (5)	TV (2)
systematic (2)	theft (6)	topics (1)	Twenty-six (1)
< T >	Thelma (3)	total (1)	twice (2)
table (1)	theory (1)	totally (3)	two (63)
tactics (1)	thereof (1)	touch (4)	type (4)
take (70)	thing (41)	touched (1)	types (1)
taken (18)	things (57)	touching (1)	< U >
takers (1)	thing's (1)	tough (7)	ugliness (1)
takes (1)	think (169)	toxic (2)	uh-huhs (1)
talk (45)	thinking (3)	tracing (1)	uh-uhs, (1)
talked (22)	Third (7)	track (1)	UK (2)
talking (73)	Thirdly (1)	trade (13)	ultimate (5)
talks (5)	thirty (1)	traded (1)	ultimately (1)
tank (1)	this' (1)	trading (1)	unable (1)
tape (1)	this-and-that (1)	trafficking (9)	unacceptable (1)
targets (1)	Thomas (12)	train (1)	unauthorized (1)
task (1)	thoroughly (1)	transcribed (1)	unaware (2)
tasks (3)	thought (30)	transcript (4)	unbearable (1)
tax (1)	thoughts (2)	transcription (2)	unchanged (2)
taxable (1)	thousand (4)	trap (1)	unclear (1)
tax-deductible (2)	threat (6)	trapped (2)	uncomfortable (4)
team (1)	threaten (2)	travels (2)	underneath (6)
tech (1)	threatened (2)	treasurer (1)	underpinnings (1)
technology (2)	threatening (2)	treat (2)	understand (32)
Telegram (1)	threatens (1)	trespassed (1)	understanding (5)
Telegrams (1)	three (30)	trial (1)	understands (3)
telephone (3)	threes (1)	Tricia (47)	understood (6)
television (2)	three-something (1)	Tricia's (2)	undertaking (2)
tell (103)	threw (2)	trick (1)	underway (1)
telling (25)	throat (2)	tried (12)	uneasy (2)
tells (5)	throats (1)	trigger (1)	unendingly (2)
ten (20)	thrown (1)	trip (9)	unfair (1)
tense (14)	Tiffany (9)	trouble (7)	Unfortunately (1)
tension (2)	till (3)	troubled (7)	unhappy (8)
term (1)	time (150)	trouble's (1)	unilaterally (2)
terminated (2)	timeline (1)	troubling (6)	unintelligible (11)
	timeliness (1)	true (20)	

UNITED (4)	viper's (2)	welcome (7)	word (24)
universe (1)	virtually (1)	welcoming (1)	wording (1)
unknown (3)	virtues (1)	welfare (2)	words (11)
unlawful (1)	vis-à-vis (2)	well (201)	work (88)
unpleasant (1)	visit (1)	went (33)	worked (14)
unquote (4)	visited (1)	we're (126)	working (25)
unquoted (1)	vituperation (1)	we've (9)	workplace (9)
unrelated (4)	voice (2)	What'd (4)	work-related (1)
untrustworthy (1)	volatile (1)	What're (3)	works (15)
unwanted (7)	volunteer (1)	WhatsApp (1)	workshops (2)
unwelcome (3)	voyeur (1)	WhatsApps (1)	world (2)
ups (1)	vs (2)	whatsoever (5)	worried (8)
upset (13)	vulgarity (2)	when's (2)	worries (1)
use (13)	< W >	Where'd (4)	worry (1)
useful (2)	W-2 (1)	whipped (1)	worse (1)
usual (2)	Wait (14)	whisper (1)	worth (7)
usurpers' (1)	waited (3)	whispering (3)	would've (12)
< V >	waiting (2)	white (3)	wrap (1)
vagina (4)	waive (2)	whitewashed (1)	wrapped (1)
vague (2)	waived (1)	wholesale (1)	wreck (1)
valid (2)	walk (1)	wholly (1)	write (3)
value (14)	walking (1)	who've (1)	writes (3)
variable (1)	wall (2)	why'd (1)	writing (6)
various (4)	wandered (1)	wife (2)	written (12)
vehicle (1)	wanna (66)	WILLIAM (2)	wrong (24)
veracity (2)	want (58)	willing (4)	wrong, (1)
verb (1)	wanted (29)	willingness (1)	wrongly (1)
verbal (2)	wants (20)	willy-nilly (1)	wrote (14)
verbs (1)	warranted (2)	window (1)	< X >
verified (3)	wary (1)	wink (1)	X'd (1)
verify (1)	Washington (6)	wish (9)	XX (5)
verse (4)	waste (2)	wished (1)	< Y >
version (3)	wasting (5)	wishes (1)	Yeah (119)
versions (2)	watch (1)	withdraw (5)	year (18)
versus (1)	watched (3)	withdrawing (4)	yearly (1)
vice (2)	watching (1)	withdrew (2)	years (25)
victim (1)	wax (1)	witness (284)	yelling (1)
video (6)	waxing (1)	witnessed (4)	Yep (26)
videoconference (1)	way (57)	witnesses (5)	yesterday (2)
Videographer (33)	ways (11)	Wolson (6)	Yonchek (6)
Videotaped (1)	web (1)	Wolson's (1)	York (3)
views (3)	website (6)	woman (1)	Yup (9)
VII (1)	week (18)	woman's (3)	< Z >
vindictive (1)	weekly (2)	women (35)	ZABROSKE (2)
violate (1)	weeks (5)	women's (4)	Zero (1)
violated (2)	weigh (1)	Wonder (1)	Zoom (5)
violating (1)	weird (1)	wonderful (1)	zooming (1)
violation (2)	weirded (1)	wondering (2)	